



Analysis of Impediments to Fair Housing Choice

City of Chandler, Arizona

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**Analysis of Impediments to Fair Housing Choice
City of Chandler, Arizona
March 2011**

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EXECUTIVE SUMMARY – MARCH 2011

Background: The Analysis of Impediments to Fair Housing Choice (AI) is a review of impediments to fair housing choice in the City of Chandler, as required by the U.S. Department of Housing and Urban Development (HUD).

The AI involves: 1) A review of the city's demographic, economic, and housing characteristics; and laws, regulations, and administrative policies, procedures and practices; 2) An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and an assessment of conditions, both public and private, affecting fair housing choices for all protected classes;

According to HUD, impediments to fair housing choice are:

1. Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
2. Any actions, omissions or decisions *that have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

Community Participation Process: The City of Chandler AI includes input from many city officials, citizens, housing service providers, non-profits, Realtors, and lending institutions. A survey was posted online and distributed to the public and at nonprofit, neighborhood, City, and other meetings, resulting in 275 responses. The majority of responses suggested education and public outreach is needed to improve fair housing choice and remove impediments.

The AI includes:

- Community Profile Analysis
- Analysis of Current Planning and Zoning Barriers
- Review of Fair Housing Testing and Compliance Data, Including Mortgage Data
- Internet Surveys, Public Surveys, and Key Person Interviews
- Chandler's Fair Housing Accomplishments
- Public Outreach Efforts
- Impediments and Recommendations for Addressing Impediments

Community Profile Summary (based on the American Community Survey 2006-2008):

Population:	249,346	
Median Household Income:	\$70,924	
Households <\$25,000	10,294 (6% of population below poverty level)	
Households \$25,000 to \$50,000	17,308	
Civilian Labor Force:	138,574 (56% of population)	
Housing Units:	96,434 (9,169 vacant)	
Public Housing Units:	303	
Section 8 Housing Vouchers:	480	
Educational Attainment	90% over age 25-high school diploma	
Occupied Households in Chandler	Owner-Occupied	Renter-Occupied
87,265	68%	32%
Disabled Households	Owner-Occupied	Renter-Occupied
4,367	70%	30%

Previous Impediments Identified In The 2008 Chandler AI:

- Low and moderate income residents experience housing discrimination.
- Landlords and housing providers are unaware that they are violating fair housing laws.
- Spanish speaking residents feel that services are inaccessible to them.
- Housing occupancy code limits housing choices for buyers.

Past Actions The City Has Taken In Response To The 2008 Impediments:

- Distributed 350 copies of fair housing literature.
- Distributed 50 copies of “Ten Most Common Fair Housing Mistakes” brochure.
- Maintained Fair Housing Hotline and maintained a call log for fair housing complaints and referrals.
- Provided Fair Housing Hotline information in the City’s water bill.
- Housing program information was made available in Spanish and English.

Recommended Ongoing Actions To Address Previous Impediments In 2008 AI:

- Continue to distribute fair housing materials and information by using the existing network of agencies and organizations.
- Maintain a Fair Housing Hotline. Make Spanish-language information available on the Hotline.
- Establish a tracking mechanism for cases referred to the Arizona Attorney General’s Office.
- Expand use of Chandler Channel 11 for fair housing information dissemination.

Existing Impediments Identified In 2010 Chandler AI:

The research, surveying, and interviews conducted for the AI did not identify any substantial fair housing impediments within the City of Chandler. The City has made efforts to be proactive in supporting fair housing education although public education needs to be ongoing. However, the impediments identified below could potentially become barriers to fair housing choice in Chandler if not addressed by the City or other interested organizations.

- *Education and Outreach:* Survey results, interview responses, and analysis of fair housing complaint data indicate that the Chandler community does not have a comprehensive understanding of fair housing rights and responsibilities
- *Fair Housing Testing:* There is no fair housing testing specifically for Chandler. Fair housing testing includes sending testers to landlords, management companies, and other housing providers to identify if a person is treated differently due to race, color, disability, or other protected class.
- *Fair Housing Mediation:* There is no group funded by the City to perform fair housing mediation.

- *Data Collection, Tracking and Follow-Up:* There is no central reporting system or mechanism for the City to collect data, track, or follow-up on fair housing complaints.
- *Housing Counseling:* There is a need for homebuyer, debt management, and related housing / financial counseling.
- *Accessible Housing:* Survey results indicate a need for the City to evaluate ADA education and accessible housing needs.
- *Discrimination Related to Rental Properties:* Survey responses point to the existence of some landlords who refuse to rent to minority applicants and families with children, and will not make accommodations for the disabled.

Recommendations To Address Existing Impediments Identified In 2010 AI:

- The City should maintain a Fair Housing Officer.
- The City should use existing committees, nonprofits, housing industry organizations and networks to provide fair housing education opportunities, and assist with fair housing complaint referrals.
- Use existing City committees, nonprofits and other resources to survey and assess agencies and organizations for the status of fair housing complaints and issues.
- Use Chandler Channel 11 programming and website, and the City newsletter, to reach more citizens with fair housing information all year.
- Use the Mayor's Committees on Disabilities and Aging to disseminate information and increase awareness of fair housing issues and discrimination among the elderly and persons with disabilities.
- Contract with service providers to complete fair housing testing to help identify any existing discriminatory practices that may occur in Chandler.
- Establish a feedback mechanism for Fair Housing Hotline cases referred to the Arizona Attorney General's Office.
- Provide funding for homebuyer, debt management, and related housing and financial counseling.
- Continue to make efforts to provide builders with information packets regarding ADA requirements, post requirements on the City's website, and incorporate ADA requirements in the development review and permitting process of housing construction.
- Partner with the Mayor's Committee for People with Disabilities and other groups to conduct a comprehensive review of the ADA accessible housing needs.
- Provide additional fair housing training, education, and monitoring of landlords within the City and the Section 8 program.
- Convene representatives of the City's Section 8 Program, HUD, and other groups that address fair housing issues, to develop information-sharing and a related education program for Section 8 Staff and Landlords.

I. INTRODUCTION

Analysis of Impediments Background

The Analysis of Impediments to Fair Housing Choice (AI) is a U.S. Department of Housing and Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector. The AI is required for the City of Chandler, as all HUD grant entitlement jurisdictions, by federal regulatory requirements at 24 CFR 91.255(a)(1); 91.325(a)(1); and 91.425(a)(1)(I).

The AI involves:

- A review of the city's demographic, economic, and housing characteristics.
- A review of a city's laws, regulations, and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes;

According to HUD, impediments to fair housing choice are:

1. Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
2. Any actions, omissions or decisions *that have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

Although the AI itself is not directly approved or denied by HUD, its submission is a required component of the City's Consolidated Plan. HUD states that the purposes of the AI are to:

- serve as the substantive, logical basis for the Fair Housing Plan;
- provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- assist in building public support for fair housing efforts both within an entitlement jurisdiction's boundaries and beyond.

To most accurately evaluate current fair housing conditions within the City of Chandler, the AI includes a review of demographic and housing market data, pertinent legislation, regulations affecting fair housing, public education and outreach efforts, and a community fair housing survey. The AI allows the City to identify any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to mitigate such barriers.

Fair Housing Act

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability. The Fair Housing Act covers most types of housing

including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. The State of Arizona has a fair housing law (Title 41, Article 7) similar to the Federal Fair Housing Act, with some enhanced protections specifically addressing familial status and disability.

Who Conducted the AI

The City of Chandler's 2010 Analysis of Impediments to Fair Housing Choice was conducted by ASK Development Solutions, Inc. (ASK), a consulting firm working on behalf of the City of Chandler.

Participants in the AI

The City of Chandler AI included input from many city officials, citizens, and key persons involved in housing and community development industry, and in particular, fair housing. The consultant developed fair housing surveys for citizens, housing service providers, Realtors, and lending institutions. A fair housing survey link was posted on the City's Community Development Division website and sent to all Commission Liaisons, Boards and Committees. The link was also placed on flyers which were posted at the city libraries to facilitate people who did not have computers at home. Surveys were distributed to Chandler Non-Profit Coalition Members. In addition, City Community Development staff distributed surveys by hand at the following community locations and events: The Chandler Christian Community Center; The CARE Center; neighborhood meetings promoting the City Rehab programs; Neighborhood Advisory and Committee Outreach Meeting; the Chandler Symphony Event of 9/11; and the Homeowner's Association Academy. Copies of the survey were also available in Spanish.

Surveys were utilized to gather information from housing consumers and from various sectors of the housing industry about their experiences and perceptions of housing discrimination and their opinions on the fair housing laws and services. ASK staff conducted interviews with key individuals from City staff, non-profits, the U.S. Department of Housing and Urban Development (HUD), and housing providers to collect additional information about fair housing practices and impediments in the City. Additionally, public meetings were conducted to solicit input on fair housing discrimination and impediments to fair housing from the City's Housing and Human Services Commission, the Chandler Non-profit Coalition, various industry representatives and service providers, and the public stakeholders at large. Additional information was gathered via meeting, teleconference and email correspondence with HUD, the Arizona Attorney General's Office, and other non-profit and advocacy groups. Staff of the City of Chandler Neighborhood Resources Division actively participated in development of the AI.

Planning and Research Methodology

The consultant's methodology in undertaking the 2010 Chandler AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (HUD Office of Fair Housing and Equal Opportunity); experience conducting AIs for other cities, and

the desires of the City as espoused by the Community Development Division. The scope of work consisted of the following tasks:

Task 1 - Project Launch

Consultant met with the project managers from the city to refine work tasks and the project schedule, establish reporting relationships and review expectations of the project. Consultant collected relevant data, identified potential candidates for key person interviews, and discussed the public participation components of the study. Consultant then began creation of the survey instruments.

Task 2 - Community Data Review

Consultant reviewed existing demographic, economic, employment and housing market information for the City of Chandler using the U.S. Census 2008 American Community Survey; lending data from the Home Mortgage Disclosure Act (HMDA); foreclosure data from Realty Trac; data and maps from Chandler's Five Year Consolidated Plan for FY 2010–2014; data from the previous four Consolidated Annual Performance and Evaluation Reports (CAPER); and data and maps from documents available via the City's website. In addition, the consultant conducted public meetings and teleconferences.

Task 3 - Regulatory Review

Consultant researched and collected information regarding Chandler's current development regulations, planning and zoning fees, housing policies and programs that influence fair housing choice and impediments, through a review of the City's policies and interviews with key City staff. ASK staff corresponded via email and/or teleconference with the State Attorney General's office, as well as fair housing service providers and agencies, to further investigate fair housing policies and potential impediments.

Task 4 - Compliance Data Review

The consultant collected and analyzed all applicable available data regarding compliance with local, state and federal Fair Housing Law, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act and the Community Reinvestment Act (CRA). ASK also analyzed reported fair housing complaints and conducted a review of legal cases in the City involving Fair Housing law. Complaint data and the process of disposition of any cases from the City's fair housing hotline were reviewed for evidence of fair housing practices and impediments. Complaint data received through the City's Public Relations Department was also reviewed for fair housing cases as well as fair housing outreach efforts through the City's Government channel 11.

Task 5 - Internet Surveys, Direct Surveys, and Personal Interviews

In early September 2010, the consultant conducted an online survey available to all Chandler residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, their knowledge of fair housing laws, their utilization of Chandler's housing assistance and social service programs, and their opinions about housing and social service needs in the city. In addition to the online survey for housing consumers, surveys were created to elicit input and fair housing data

from housing providers, realtors and lenders. Surveys were also directly administered and public meetings conducted by both City staff and the consultant to secure input. As well as the online surveys, City staff administered the survey instrument at several meetings and City events or through non-profit agencies resulting in over 275 responses. The consultant conducted key person interviews with members of the Housing and Human Services Commission, the Chandler Nonprofit Coalition, Mayor's Committee for People with Disabilities and the Aged, community groups, the Arizona Attorney General's office, City of Chandler staff, and nonprofit agencies.

Task 6 - Identification and Analysis of Impediments

The consultant then analyzed the findings from the first five tasks in order to determine what impediments to fair housing choice exist in the City of Chandler. The consultant also reviewed identified impediments from the 2005 and 2008 Analysis of Impediments report, determined what actions had been taken by the City to address those impediments and the existing status of those impediments.

Task 7 - Recommendations

In consultation with City staff, the consultant developed a recommended Action Plan for addressing the identified impediments.

Summary of Impediments Found

- Need for fair housing education and outreach.
- Lack of fair housing testing.
- Need for fair housing data collection, tracking and follow-up.
- Lack of housing counseling for homebuyers, debt management, and related housing and financial issues.
- Existence of accessible housing needs.
- Existence of discrimination related to rental properties.

Summary of Recommendations to Address Impediments

- Use existing institutional structure for fair housing education and outreach.
- Establish a Fair Housing Officer.
- Use Chandler Channel 11 and City newsletter for fair housing information.
- Invest in fair housing testing services.
- Establish a feedback mechanism for tracking fair housing cases.
- Support funding for housing counseling services.
- Establish an Affordable Housing Consortium.
- Provide additional information on ADA requirements and use the Mayor's Committee for People with Disabilities to review accessible housing needs.
- Provide additional fair housing education and training to landlords.

AI Funding

According to the City of Chandler's Consolidated Plan for FY 2010-2014, the City has not designated direct funding for fair housing activities or services. However, City staff identified Solve It!, a mediation agency previously funded by the City's General fund, as a possible fair housing service provider.

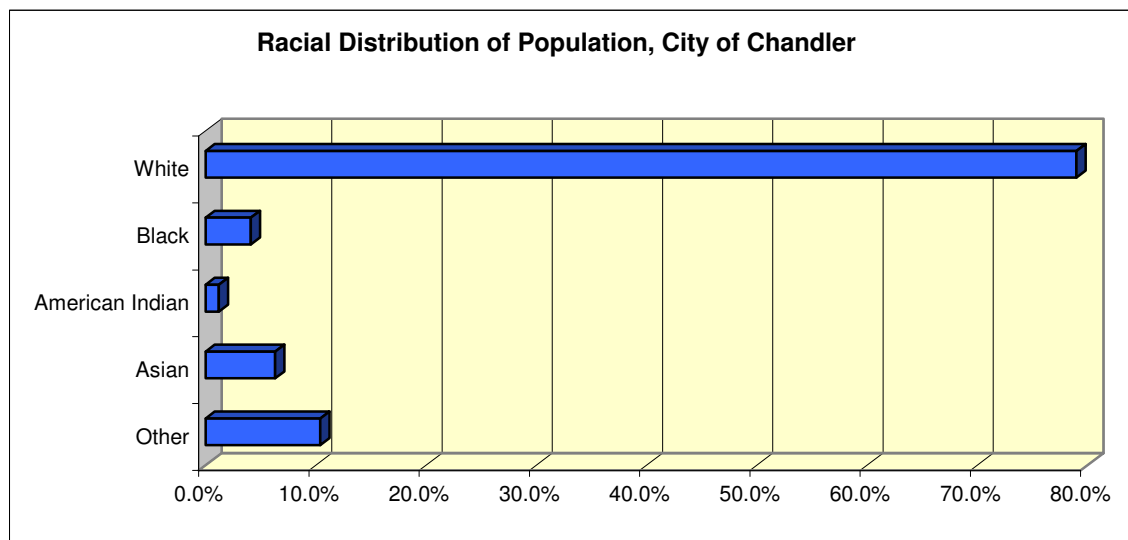
II. COMMUNITY PROFILE

Introduction

The American Community Survey 2006-2008 represents the most recent available data from the U.S. Census, providing most informational items as the decennial Census, but not always at the lowest geographic levels. The Community Survey, in addition to a variety of other highly regarded data sources were utilized for the preparation of this report, including Home Mortgage Disclosure Act (HMDA) data; RealtyTrac data service; official City of Chandler planning and reporting documents, and direct communication with local agencies. Overall, the data paint a revealing and fair portrait of the community and housing conditions therein.

Population, Race, and Ethnicity

The City of Chandler had a total population of 249,346 at the time of the 2008 American Community Survey, a growth of 41% (73,008) from the time of the 2000 Census. The racial makeup of the community was overwhelmingly White (79.0%), but also included populations identifying themselves as Black (4.1%), American Indian (1.2%), Asian (6.3%), and other races, including two or more (10.4%). Over 21% (52,999) of Chandler's population identified themselves as being of Latino or Hispanic origin, representing the largest ethnic population in the City. Thirteen percent (13%) of Chandler's population, or 31,218 persons, were born outside of the United States.

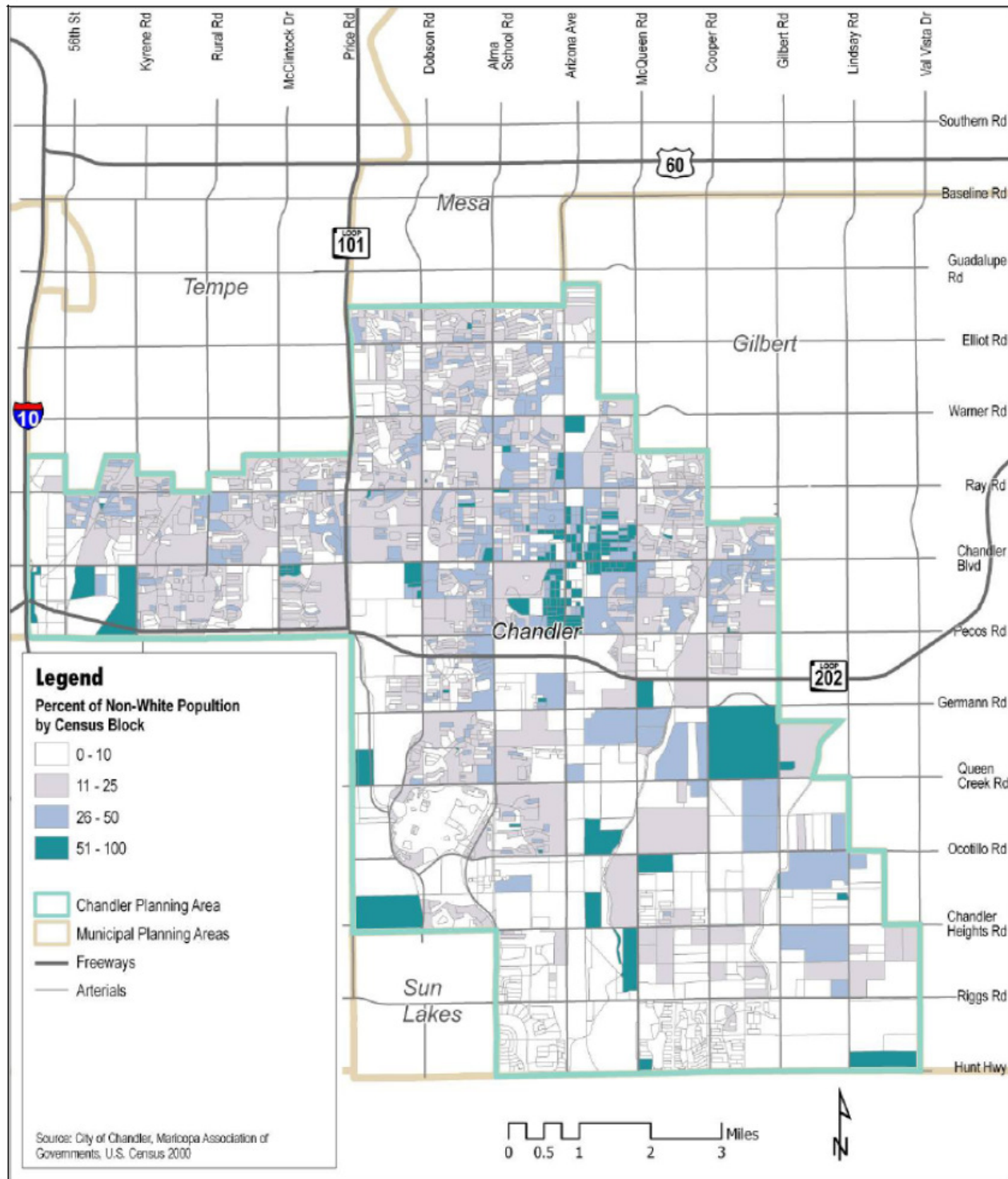


U.S. Census Bureau, 2008 American Community Survey

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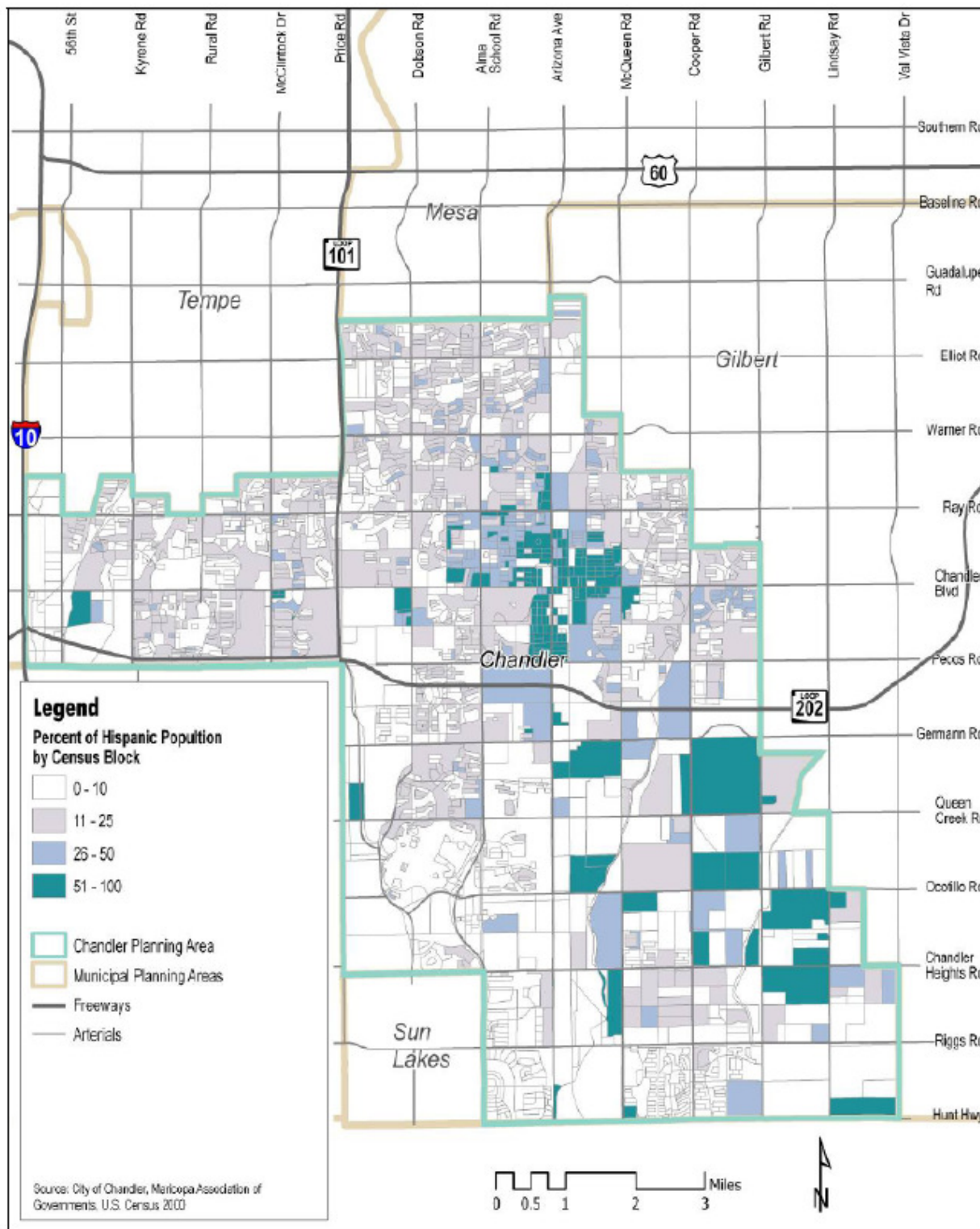
Racial/ethnic information was not available by Census Tract from the 2008 American Community Survey, therefore, the maps on the following pages graphically depict the location of the City's minority populations: "Non-White" and "Latino/Hispanic Origin" based on 2000 Census data.

Minority (Non-White) Population, City of Chandler



Source: City of Chandler Transportation Master Plan Update 2010

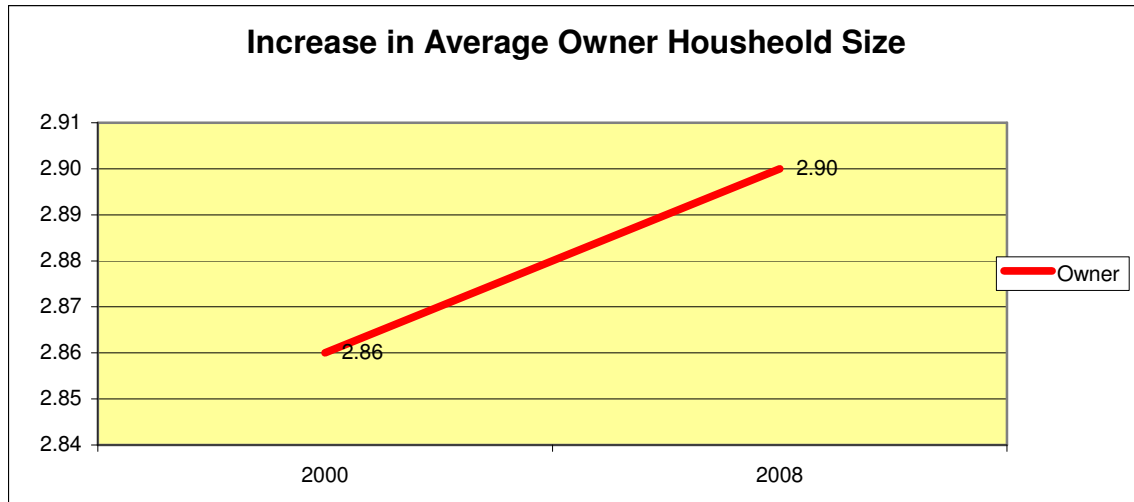
Hispanic/Latino Population, City of Chandler



Source: City of Chandler Transportation Master Plan Update 2010

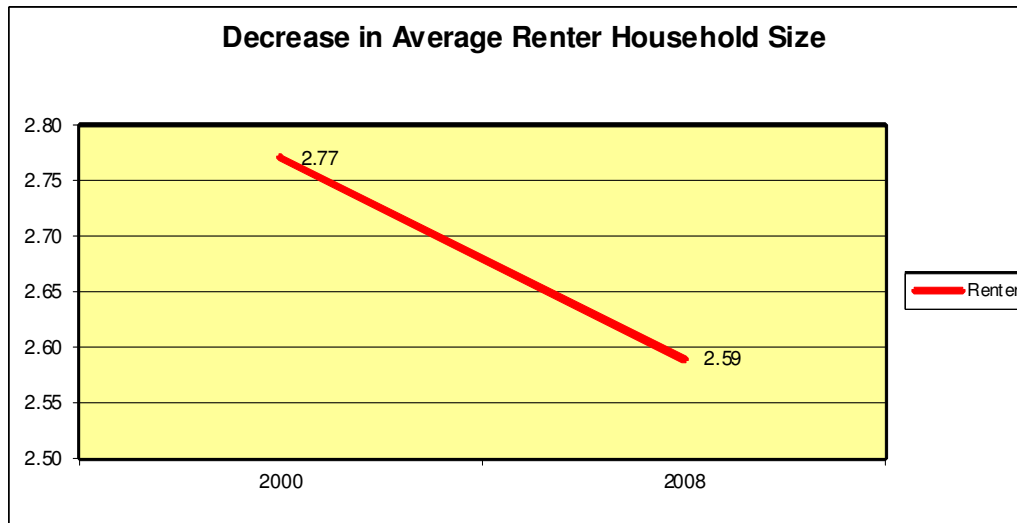
Household Characteristics

Since the 2000 Census, average household sizes have increased slightly for owner-occupied households, from 2.77 persons per household to 2.59 persons per household, but decreased for renter-occupied households, from 2.77 persons per household to 2.59 persons per household. Overall, average household size remained relatively flat, changing from 2.83 persons per household to 2.82. persons per household between 2000 and 2008.



Source

: U.S. Census Bureau, 2008 American Community Survey



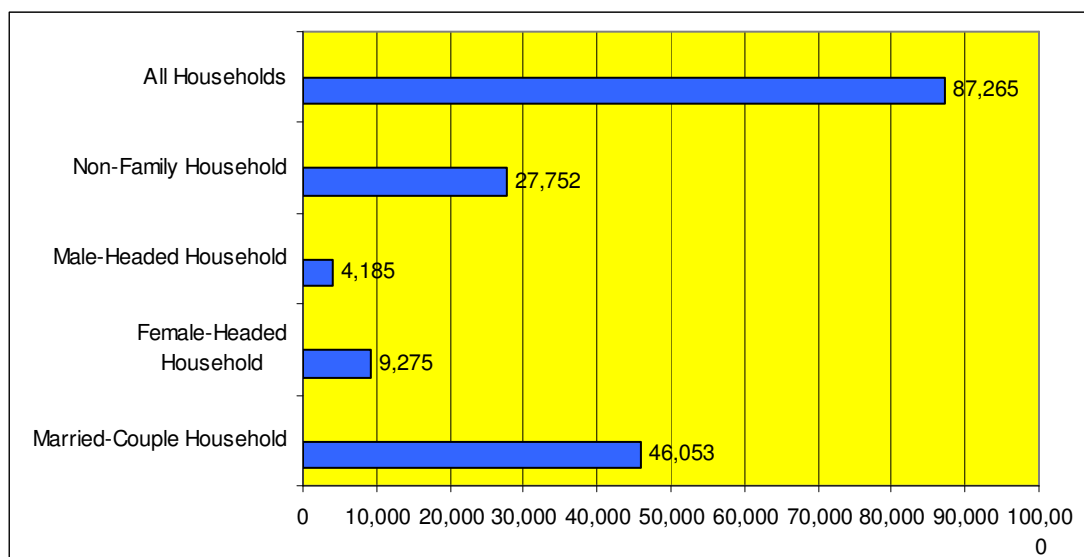
Source

: U.S. Census Bureau, 2008 American Community Survey

Among Chandler's 87,265 households, family households represented 68% of all households, including: 46,053 (53%) married couple families; 4,185 male-headed households (5%); and 9,275 (11%) female-headed households. Non-family households comprised a significant amount at 32% of all households.

Married couple families were most often homeowners at 42% (36,922) of all households, followed by non-family households at 18% (15,861). Female-headed households exceeded numbers of male-headed households in terms of homeownership: 4,590 female-headed and 2,350 male-headed. All household type rates of homeownership exceeded their respective rental rates with the sole exception of female-householders who were more likely to be renters. Married-couple families exhibited the greatest discrepancy between rates of homeownership and renting with 80% owning and 20% renting.

Household Types among All Households, City of Chandler



Source: U.S. Census Bureau, 2008 American Community Survey

Income, Education, and Employment

Income Characteristics

HUD's 2008 Income Limits for the Phoenix-Mesa-Scottsdale MSA, defined Very-low Income (<30% MFI) households as those earning no more than \$19,250; Low Income (31-50%MFI) households as those earning no more than \$32,100; and Moderate income (51-80%MFI) households as those earning no more than \$51,350. All figures are based on a household size of four (4) and 2008 Area Median Income of \$64,200 for the Phoenix-Mesa-Scottsdale MSA.

The median household income in the City of Chandler in 2008 was \$70,924, an increase of 21% over that of 2000, and significantly higher (9%) than that of the greater metropolitan area.

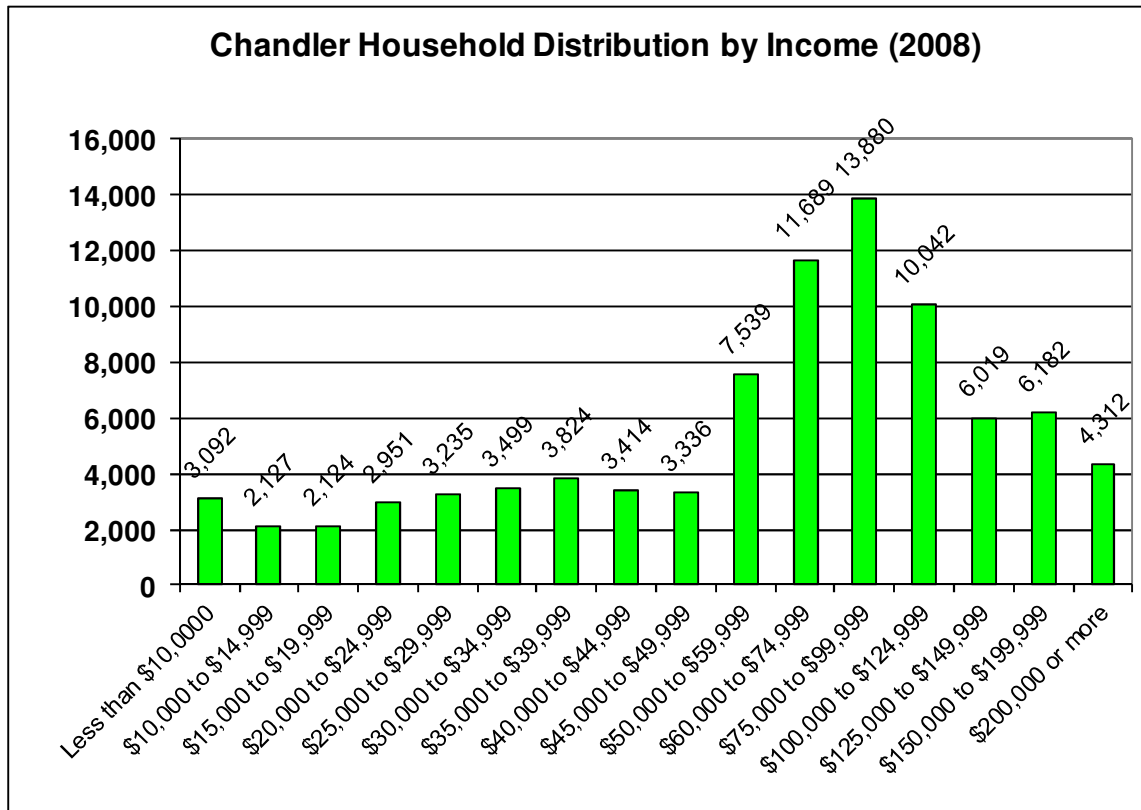
The relative affluence of Chandler is evident in examination of household income distribution. In 2008, of the total 87,265 households in Chandler, only 12% of (10,294) earned less than \$25,000 annually, with another 20% (17,308) having earned between

\$25,000 and \$50,000. The majority of households (68%) earned incomes the middle and upper brackets in 2008, with over 22% (19,228) having earned between \$50,000 and \$75,000; 16% (13,880) having earned between \$75,000 and \$100,000; and 30% (26,555) having earned more than \$100,000.

Per HUD income category definitions, approximately 8.4% (7,343) fell into the Very-Low Income category (0-30% AMI); 7.1% (6,186) fell into the Low Income category (31-50% AMI); 16.1% (14,073) fell into the Moderate Income category (51-80% AMI); and 22.0% (19,228) fell into the Middle Income category (81-120% AMI). Forty-six percent of households (40,435) earned greater than 120% of Area Median Income. In total 31% of Chandler households met the HUD low- and moderate-income definition (0 – 80% AMI).

Per the American Community Survey, of Chandler's estimated 87,265 households, only 6% (5,442) subsist below the poverty level. Nearly equal numbers of family (2,867) and non-family households (2,575) experience poverty. Female-headed households experience poverty at the greatest rate (28% of all impoverished households) in proportion to their incidence in the total population (11% of all households). In 2008 only 6% of Chandler's household population (5,058) received some form of public assistance such as SSI, cash public assistance, or food stamps. The greatest geographic concentration of impoverished households is found in downtown Chandler and the immediately abutting neighborhoods.

The following table depicts the income distribution of all households in Chandler.



Source: U.S. Census Bureau, 2008 American Community Survey

Educational Attainment

The level of educational attainment of the citizens of Chandler is impressive with ninety percent of persons over age twenty-five having achieved a high school diploma or its equivalency. Another thirty-four percent (34%) of this population began college coursework, but did not attain a degree, or hold an Associate of Arts degree. Twenty-three percent (23%) of Chandler's population 25 years and older holds a bachelor's degree, and just over eleven percent (11%) hold a Master's, Doctoral, or Professional degree. There was no significant differentiation in rates of educational achievement between males and females.

Employment

As of 2008, Chandler's civilian labor force numbered 138,574 or approximately 56% of the City's total population. The labor force was approximately 54% male and 46% female. Labor force participation for persons aged 16 and older was just over 75%.

The national economic downturn in recent years has struck the Phoenix-Mesa Metropolitan area as well, and unemployment in Maricopa County has risen dramatically from 3.4% in 2007 to 7.9% in 2009 (Bureau of Labor Statistics). Census data for the City of Chandler indicated an unemployment rate of 4.7% in 2008, demonstrating that perhaps Chandler is weathering the economic downturn better than the region as a whole.

The City of Chandler has job opportunities in a fairly diversified economy, and the well-educated character of its population is reflected in the major industries of employment. Five top industries provide employment for over one-third of the City's workforce:

Education, Healthcare, and Social Assistance.....	24,312 (18.4%)
Manufacturing.....	18,172 (13.8%)
Retail trade.....	16,168 (12.2%)
Professional, Scientific, and Management.....	15,460 (11.7%)
Finance, Insurance, and Real Estate.....	13,258 (10.0%)

Chandler has a well-developed and growing economic base that provides employment opportunities not only for the citizens of Chandler, but also for commuters from the surrounding communities. The top ten employers located in Chandler provide a total of 27,908 jobs in a variety of fields.

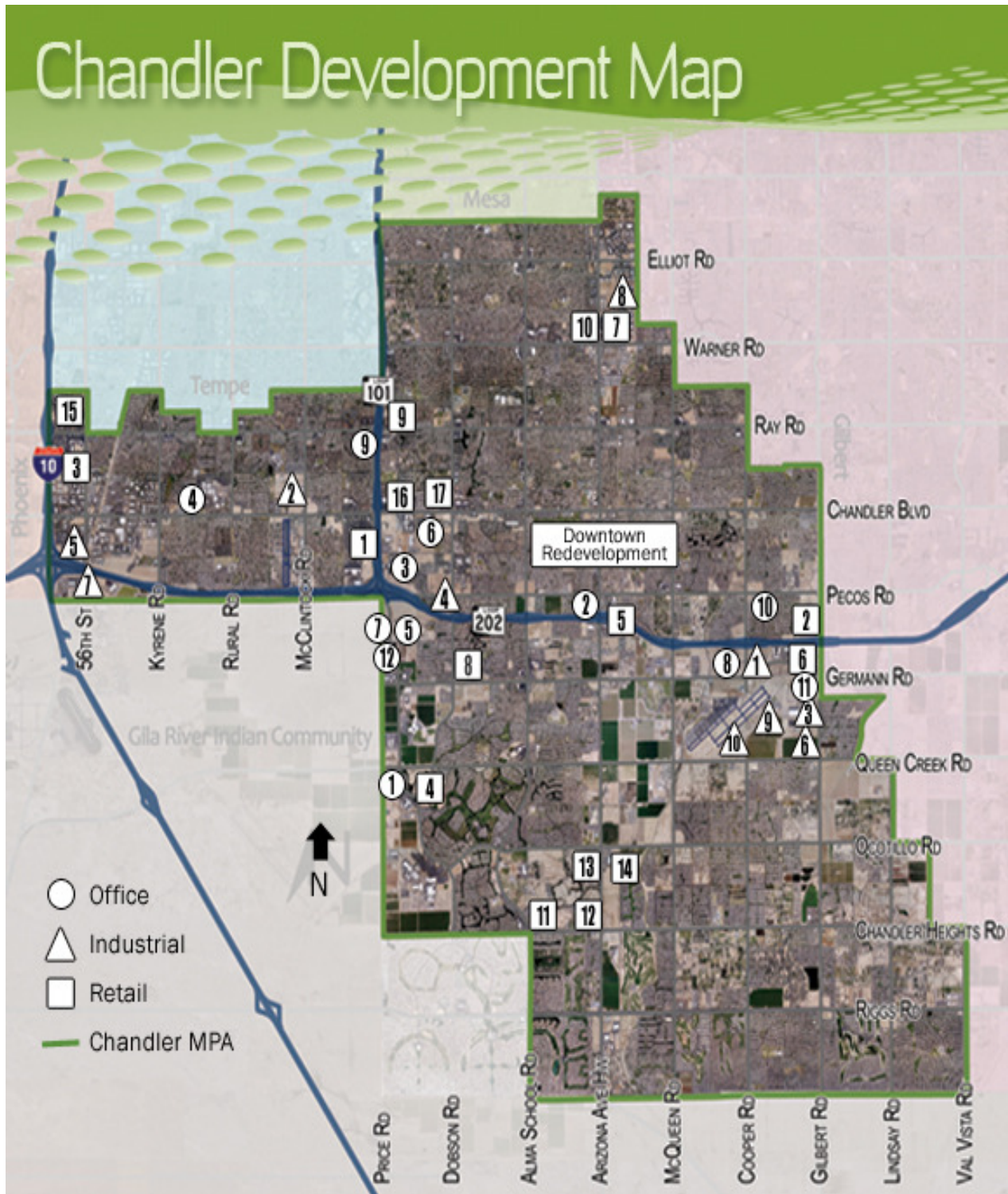
Organization	# of Employees	Employment Type/Specialty
Intel	10,000	Microprocessors
Bank of America	3,500	Mortgage Processing Center
Chandler School District	3,000	Education
Wells Fargo Ocotillo Corporate Campus	2,243	Corporate Banking
City of Chandler	1,652	Government
Chandler Regional Hospital	1,600	Healthcare
Microchip Technology	1,538	Microprocessors
Verizon Wireless	1,500	Customer Support & Regional Corporate Headquarters
Freescale Semiconductor	1,450	Semiconductors, Satellite Systems
Orbital Sciences	1,425	Aerospace Launch Systems

Source: City of Chandler Economic Development

Employment Centers

Generally, as in most cities, major employment centers in the City of Chandler tend to be clustered around transportation corridors, in particular Loop 101 and Loop 202. The greatest density of employment centers appears in the vicinity off the intersection of Loop 101 and Loop 202/Price Road, including primarily office and retail centers. The second largest cluster of employment centers appears in the area surrounding the Chandler Airport, including a greater density of industrial uses. A significant cluster of retail development, including the Fulton Ranch commercial centers, is located in the vicinity of South Arizona Avenue. Other major employment centers are located more sporadically throughout the City, but are noticeably lacking in the area to the north and east of the intersection of the Loop 101 corridor/Loop202 corridor and particularly in the southeastern are of the City.

Major Employment Centers, City of Chandler



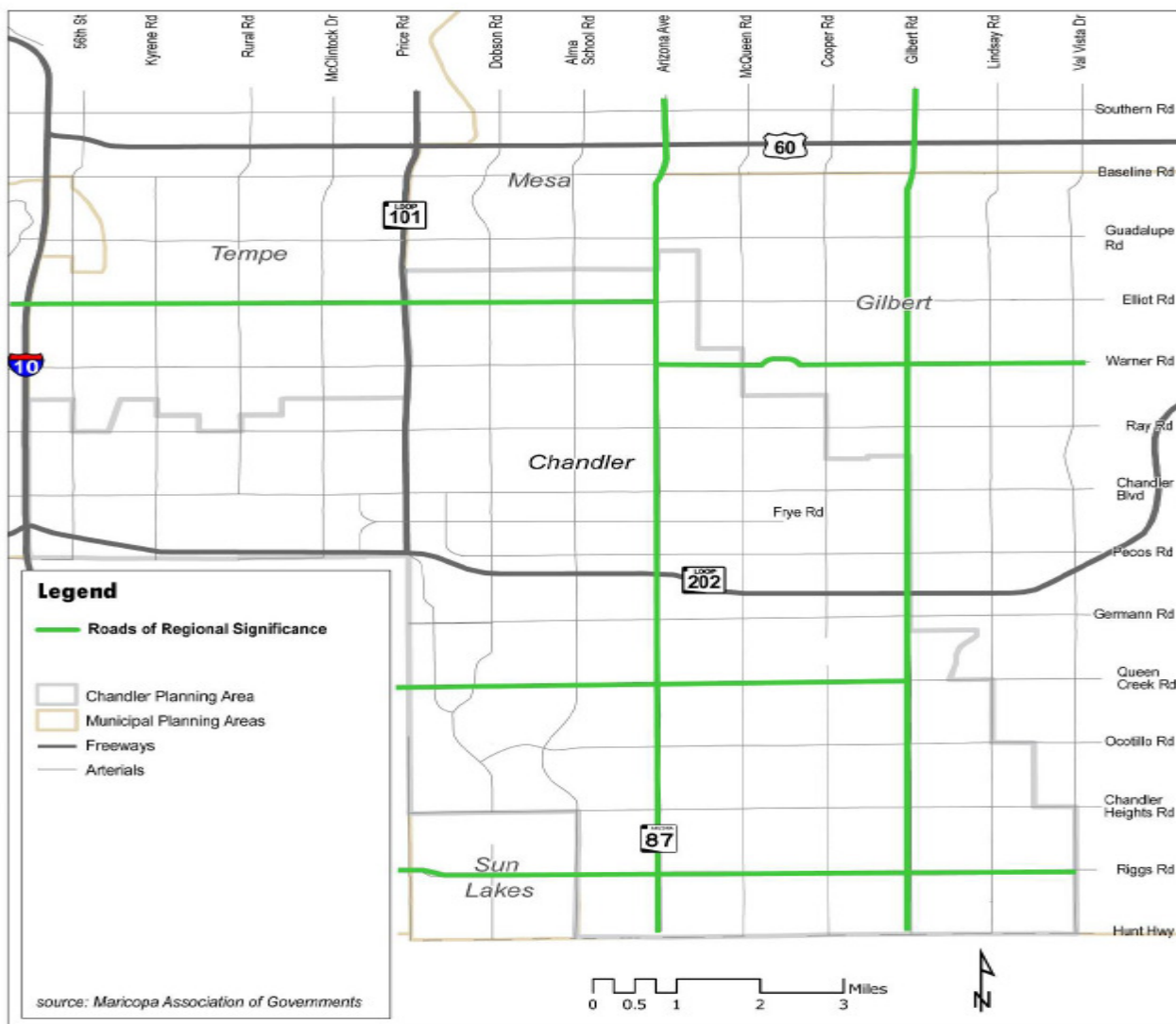
Source: City of Chandler Economic Development

Transportation and Commuting

Transportation

Transportation in/out and throughout the City is achieved via a well-developed network of roadway transportation corridors. Major highways traversing or adjacent to the City include Interstate 10 abutting the City's western boundary; U.S. Highway 60 paralleling the City just beyond its northern border; Loop 101 extending into the City from the north; and Loop 202 traversing the City east-west (see map below). Major arterial surface streets bearing some of the highest traffic loads within Chandler include: Ray Road, Chandler Boulevard, Pecos Road, Germann Road, Queen Creek Road, and Riggs Road (west-east); and Dobson Road, Alma School Road, Arizona Avenue, McQueen Road, Cooper Road, and Gilbert Road (north-south).

Major Transportation Corridors—City of Chandler



Source: City of Chandler Transportation Master Plan Update 2010

The City of Chandler provides a number of transportation programs and services to help senior citizens and people with disabilities maintain their independence within the community. Dial-A-Ride service is provided in accordance with the American with Disabilities Act (ADA) through the East Valley Dial-A-Ride (EVDAR). EVDAR provides door-to-door, shared-ride public transportation services for senior citizens and persons with disabilities. Persons with disabilities make up approximately 80% of the EVDAR service hours. Non-ADA service is funded by the City of Chandler. The City of Chandler also contracts with Maricopa County to provide transportation service to income-qualified veterans. The City of Chandler initiated a subsidized taxicab coupon program with Valley Metro in 2006. This program, modeled after successful cab subsidy programs in Mesa and Scottsdale, provides subsidized taxicab coupons for Chandler residents eligible for Dial-A-Ride services. The program is intended to provide additional transportation options for senior citizens and persons with disabilities at a lower cost than traditional Dial-A-Ride service. Under this program, participants purchase coupon booklets at a discounted price. The coupons can then be applied toward the fares of participating cab companies.

Commuting

As would be expected by the nature of the City's transportation network, the overwhelming majority of commuters--90%--travel to work via automobile, truck, or van. Of all auto commuters, twelve percent (12%) do so via carpooling, commendable, but lower than Maricopa County's carpooling rate of 15%. Approximately three percent (3%) of the workforce walked to work, making it the second most common means of transportation to work, even exceeding the use of public transportation at approximately two percent (2%). Of the total of employed persons aged 16 and over, five percent (5%) worked at home, roughly equivalent to Maricopa County's 4.8% rate of home employment.

In terms of length of commute to place of employment, again looking at the same population of employed Chandler residents aged 16 and older, but excluding those who work at home, commute times were as follows:

Travel Time to Work (one way)	Persons	Rate
Less than 20 minutes	22,086	40%
20 - 30 minutes	38,295	20%
30 – 45 minutes	27,812	20%
More than 45 minutes	9,970	20%

Source: U.S. Census Bureau, 2008 American Community Survey

As can be seen by review of the data above, the length of commute for residents of Chandler was reasonable for the majority, and significantly lower than that of comparable-sized large metropolitan areas. Approximately sixty percent (60%) of commuters traveled less than 30 minutes to their place of work, and an additional twenty percent (20%) traveled 30 – 45 minutes to their place of employment. Most revealing, eighty percent (80%) of all commuters traveled less

than 45 minutes to their place of employment. For auto commuters who also wish to use other forms of transportation the City provides three (3) shared Park-and-Ride lots from which commuters can access public transit.

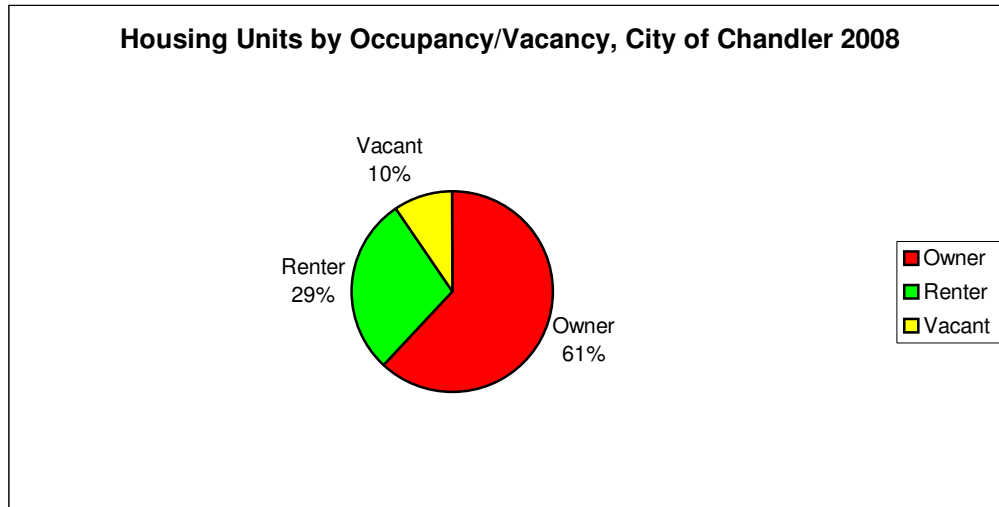
Public transportation between areas within the City and to local employment centers is served by the Regional Public Transportation Authority's (RTA) Valley Metro fixed-route bus service. Altogether, within Chandler there are 50 miles of local and express routes. Four (4) express routes provide direct service between transportation hubs and employment centers, and major destinations. Nine (9) local routes circulate throughout the City with stops every one-quarter (1/4) mile. The City has one Transit Center, located at the Chandler Fashion Center, which provides coordination and access for multiple transit routes. In addition, Chandler residents can access the I-10 East RAPID providing direct service to downtown Phoenix. RTA also offers a paratransit service in Chandler providing pickup-to-destination services in all areas of the City. The paratransit service has two components, an ADA service offered for free, and a regular service with fees based on length of trip between paratransit zones. The regional light-rail transit system (Valley Metro Light Rail), does not currently provide railway service into Chandler, although there are plans for a future line extension into the City.

III. HOUSING PROFILE

Housing by Tenure

Since the time of the 2000 Census, the number of housing units in Chandler grew by over 40% to a total of 96,434 housing units in 2008. The growth in housing units mirrors the growth in the City's total population. Yet, approximately 10% of all Chandler's housing units are now vacant (9,169 units).

Of the 87,265 occupied housing units in 2008, approximately 68% (59,723) were owner occupied and 32% (27,542) were renter occupied. This reflects a 6% decrease in the rate of homeownership (down from 74% in 2000) and a corresponding increase in rental tenure (26% in 2000).



Source: U.S. Census Bureau, 2008 American Community Survey (2009)

The City of Chandler General Plan 2008 provides more detailed data by housing type that is illustrative of the current composition and the changing nature of the City's housing stock in recent times. The General Plan provided information on the growth of the Chandler's housing stock by housing type. As of 2008, among all Chandler housing units, single-family detached housing represented 71.8%; townhouse or condominium units represented 8.6%; multi-family units represented 17.4%; and mobile homes represented 2.2%. This illustrates the characteristics of Chandler's housing stock at a point in time, but perhaps more revealing is the change in the incidence within each housing type.

The greatest proportional growth between 2000 and 2008 occurred in townhouses and condominiums, whose numbers increased by 94%. The second largest proportional growth occurred in single-family detached housing units whose numbers increased by 40%, followed by mobile home units at 34%, and multi-family housing at 27%.

Accordingly, although the rank of the greatest to smallest numbers of housing types amongst the total housing stock remained the same from 2000 to 2008, there were changes within each housing unit type over the time period that reflected the above growth-by-type data. The table below depicts the proportion of each housing unit type among the total housing stock in 2000, in 2008, and the change during the time period.

Change in Total Housing Stock by Type, 2000 – 2008, City of Chandler

Unit Type	2000	2008	Change
Single-family, detached	72.1%	71.8%	-0.3%
Townhouse/Condominium	6.3%	8.6%	+2.3%
Multi-Family	19.3%	17.4%	-1.9%
Mobile Homes	2.3%	2.2%	-0.1%
TOTAL	100%	100%	N/A

Source: U.S. Census Bureau, 2008 American Community Survey (2009)

The data show that all housing unit types decreased in relation to their proportion amongst the total population, with the exception of townhouses and condominiums which increased by a 2.3%, not only representing the only increase, but also the greatest change overall. The greatest decrease, and second greatest change overall was among multi-family stock which decreased by -1.9%. The proportion of single-family detached and mobile homes among housing stock decreased, but it decreased marginally (-0.3% and -0.1% respectively), in comparison to the other two housing types.

Housing Affordability

The median value of an owner occupied housing unit in 2008 was \$298,600. Using the industry standard of three (3) times income to afford a median priced home in Chandler, a household would need to earn \$99,533 annually.

Median contract rent in 2008 was \$915 monthly. Based on HUD standards that a household should not pay more than 30% of its gross income for a housing unit to be considered affordable, a household would need to earn \$36,600 annually to afford the median rent.

Median Rent and Median Home Value with Income Required for Affordability, 2008

Geographic Area	Median Rent	Income Required to Afford Median	Median Home Value	Income Required To Afford Median
Maricopa County	\$786	\$31,440	\$236,600	\$78,867
Chandler	\$915	\$36,600	\$298,600	\$99,533
Gilbert	\$1,057	442,280	\$340,300	\$113,433
Glendale	\$706	\$28,240	\$236,000	\$78,667
Mesa	\$726	\$29,040	\$222,800	\$74,267
Peoria	\$988	\$39,520	\$267,600	\$89,200
Phoenix	\$718	\$28,720	\$241,900	\$80,633
Scottsdale	\$987	\$39,480	\$491,800	\$163,933

Source: American Community Survey, U.S Census Bureau (2008)

- 1) Income to afford median rent calculated by multiplying monthly rent by 12 months, and then dividing result by thirty percent (30%).
- 2) Income to afford a home of median value was calculated by real estate industry standard of multiplying household income by three (3) to determine maximum affordable purchase price.

Again, for purposes of analyzing housing affordability change over time and at a more detailed level than that provided by the 2008 American Community Survey, the City of Chandler General Plan 2008 provided such information for new home sales versus home re-sales, and also for rental housing.

The General Plan demonstrated that median for-sale housing prices skyrocketed between 2000 and 2007, while during the same time period, the affordability of these units decreased significantly, illustrating the lag between housing price increases and income increases. The table below compares the prices of median prices of for-sale housing, each new and resale units in 2000 and 2007.

Median For Sale Home Prices 2000 and 2007, City of Chandler

Median Price 2000		Median Price 2007		Change 2000- 2007	
New Homes	Resale	New Homes	Resale	New Homes	Resale
\$172,000	\$136,000	\$443,315	\$290,000	+258%	+213%

Source: The City of Chandler General Plan, 2008.

Although housing prices for both new homes and resales each increased by more than 200%, income increased by approximately one-third. In 2000, a household only required 91% of median income to afford median priced resale, while a household required 115% of median income to afford a median-priced new home. Due to the huge price increases, by 2007, a household earning median income could only afford 87% of the cost of a median-priced resale, and 57% of the cost of a median priced new home. During these years, the gap between income and price developed into a situation whereby housing prices are no longer affordable to most households.

For rental housing, prices increased and affordability decreased, but not nearly as dramatically as with for-sale housing. In 2000, median rent in Chandler was \$705. By 2006, median rent had risen to \$982, an increase of 39%, somewhat higher than the approximate one-third increase in median income. Therefore, in comparison to owning, the option of renting is a much more affordable choice in the City of Chandler.

Community Housing Affordability Study (CHAS)

HUD's Community Housing Affordability Study (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

Because 2008 CHAS data was not available for the City of Chandler, 2008 CHAS data for Maricopa County was applied to 2008 Chandler data to yield the information herein, consistent with the Chandler Five Year Consolidated Plan 2010-2014. HUD measures affordability by cost burden.

Cost-Burdened Owners

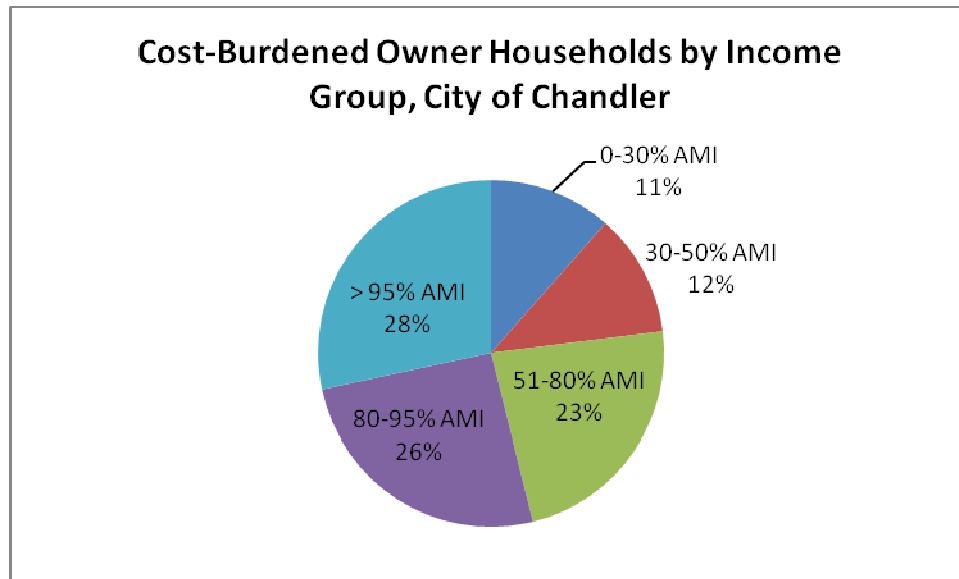
Of the 59,723 total owner households in Chandler, 17,976 (30%) were cost-burdened. The remaining 70% of owners were considered to be in affordable housing situations. Households in income groups classified by HUD as low and moderate income (0 - 80% AMI) only represented 22% (13,261) of all households. Clearly, all income groups experience cost burden to some degree, however, lower-income household groups experience cost burden at higher rates.

Although smaller in number, low- and moderate-income households represented 46% (8,275) of all cost-burdened households. The data further demonstrate that cost burden within individual income groups is greater at progressively lower income levels:

- 55% of 51-80% AMI owner households were cost-burdened;

- 70% of 31-50% AMI owner households were cost burdened; and
- 74% of 0-30% AMI owner households were cost burdened.

The following chart depicts all cost burdened owner households by income group:



Source: American Community Survey, U.S Census Bureau (2008); HUD CHAS data extrapolated for City of Chandler.

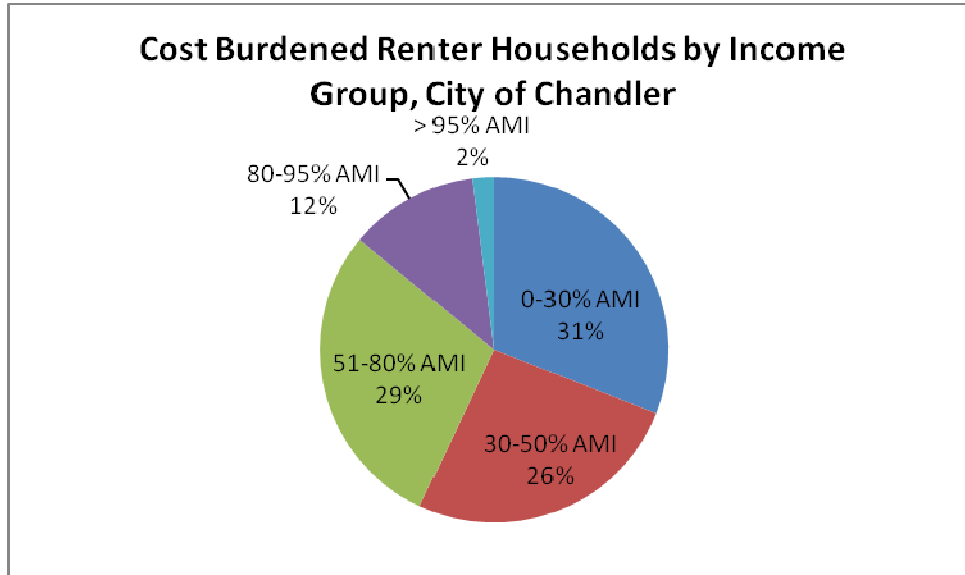
Cost-burdened Renters

Of the 27,543 total renter households in Chandler, 11,355 (41%) were cost-burdened. The remaining 59% of renters were considered to be in affordable housing situations. Compared to owners, renters were more likely to be cost-burdened. Households in income groups classified by HUD as low and moderate income (0-80% AMI) represented 52% (14,343) of all renter households. As was the situation with owners, all income groups experienced cost burden to some degree, however, lower-income household groups experienced cost burden at higher rates.

Low- and moderate-income households represented 86% (9,727) of all cost-burdened renter households. The data demonstrate that the rate of cost burden within individual income groups is large:

- 52% of 51-80% AMI renter households were cost-burdened;
- 87% of 31-50% AMI renter households were cost burdened; and
- 76% of 0-30% AMI renter households were cost burdened.

The chart below depicts all cost burdened renter households by income group:



Source: American Community Survey, U.S Census Bureau (2008); HUD CHAS data extrapolated for City of Chandler.

Housing Stock Available to Very-Low income Households

The table below depicts the housing stock available in Chandler and its neighboring communities affordable to those households earning 50% or less of median income. The data reveal a small mismatch between affordable housing opportunities for those at the lowest economic tiers (0-50% AMI—15.5% of Chandler's population), and the housing stock affordable to that same income group--14.9% of all housing units. This, however, does not speak to the quality of housing affordable to these households at the lower end of the income spectrum.

Housing Stock Available to Very-Low Income (VLI) Households

Geographic Area	50% Median Owner Income	Total Occupied Owner Units	Number Affordable to VLI Owners	Percentage Affordable to VLI	50% Median Renter Income	Total Occupied Renter Units	Number Affordable to VLI Renters	Percentage Affordable to VLI Renters
Maricopa Co.	\$34,754	910,811	73,274	8.0%	\$18,204	427,237	46,795	11.4%
Chandler	\$41,888	2,900	2,900	4.9%	\$24,040	27,542	3,944	14.9%
Gilbert	\$44,492	668	668	1.4%	\$25,553	13,379	1,358	10.4%
Glendale	\$33,723	4,459	4,459	9.2%	\$15,844	28,029	2,538	9.3%
Mesa	\$31,006	17,038	17,038	15.1%	\$17,154	56,040	4,975	9.2%
Peoria	\$36,412	3,449	3,449	8.3%	\$19,632	15,301	5,032	46.1%
Phoenix	\$32,731	22,750	22,750	7.7%	\$16,199	187,755	17,986	9.9%
Scottsdale	\$43,031	2,276	2,276	3.4%	\$24,888	26,415	3,479	13.7%

Source: American Community Survey, US. Census Bureau (2008)

- 1) Fifty percent (50%) of estimated 2008 household median income by tenure for each jurisdiction.
- 2) Total and affordable renter units include both units with contract rent and units with no cash rent.

Housing Stock Available to Disabled Persons

The most recent data comprehensive data on disability status among Chandler's population was the 2000 Census. Therefore, percentages for various disabled populations were generated from 2000 Census data to yield current percentage estimates of Chandler's disabled population among various subpopulations. This assumes proportionate growth of the disabled population among the general population, and is judged to be a reasonable method of estimation. The 2000 data is as follows:

- 8.0% of the civilian non-institutionalized population 5 years and over had a sensory disability;
- 8.6% of the civilian non-institutionalized population 5 years and over had a physical disability;
- 8.7% of the of the civilian non-institutionalized population 5 years and over had a mental disability;
- 8.8% of the civilian non-institutionalized population 5 years and over had a self-care disability;
- 9.9% of the civilian non-institutionalized population 16 years and over had a go-outside-home disability; and

- 10.1% of the civilian non-institutionalized population 16 to 64 years old had an employment disability.

Many of the above individuals have more than one reported disability item, and therefore there is much duplication between categories of disability items. In total, the data indicate that among Chandler's non-institutionalized population 5 years and older, 13.9% have one or more of the above-listed disability items.

The majority of the identified disabled population is able to live independently with or without supportive services, or is cared for by family members in private housing arrangements. However, the data still indicates the need for specialized housing for disabled persons. The need for specialized housing is dependent on the type of disability. Such housing may be specialized in terms of physical modifications, sleeping accommodations, organizational structure, security monitoring, and staffing with applicable supportive services.

According to the FY 2010-2014 Consolidated Plan, there were an estimated 4,367 householders with disabilities in Chandler in 2008, representing 5% of total households. Overlaying HUD CHAS data for Maricopa County on Chandler ACS data, more than half (53% or 2,319 households) are low or moderate income. An estimated 70% of disabled households are homeowners and 30% are renters. Disabled individuals experience many of the same social, economic and housing challenges as the elderly. In terms of housing, an estimated 56% (729) of disabled owners and 83% (848) of disabled renters experience some housing problem.

HUD's Section 811 Supportive Housing for Persons with Disabilities finances the development of rental housing with supportive services for very low-income adults with disabilities, and provides rent subsidies for the projects to help make them affordable. Chandler has one (1) Section 811 complex providing housing units for persons with disabilities. All housing units occupied by Section 8 certificate holders must meet HUD Housing Quality Standards, which require that the unit owner make reasonable accommodations if necessary for a disabled occupant.

HR 1408 is a Federal bill under consideration in the House of Representatives which would require minimum "home visitability" standards in all new housing construction, essentially making all new housing units accessible at a basic level to persons with physical disabilities. Most home features needed to allow independent living by persons with physical mobility disabilities can be incorporated into new construction at marginal cost (estimated at 0.5% additional cost by Arizona Bridge to Independent Living (ABIL)), and without substantially altering the standard unit floor plan. Retrofitting an existing unit is a more expensive, and therefore less cost-effective alternative, but necessary for those disabled households which would like to comfortably "age in place" and not have to move from their long-time homes due to developing physical mobility

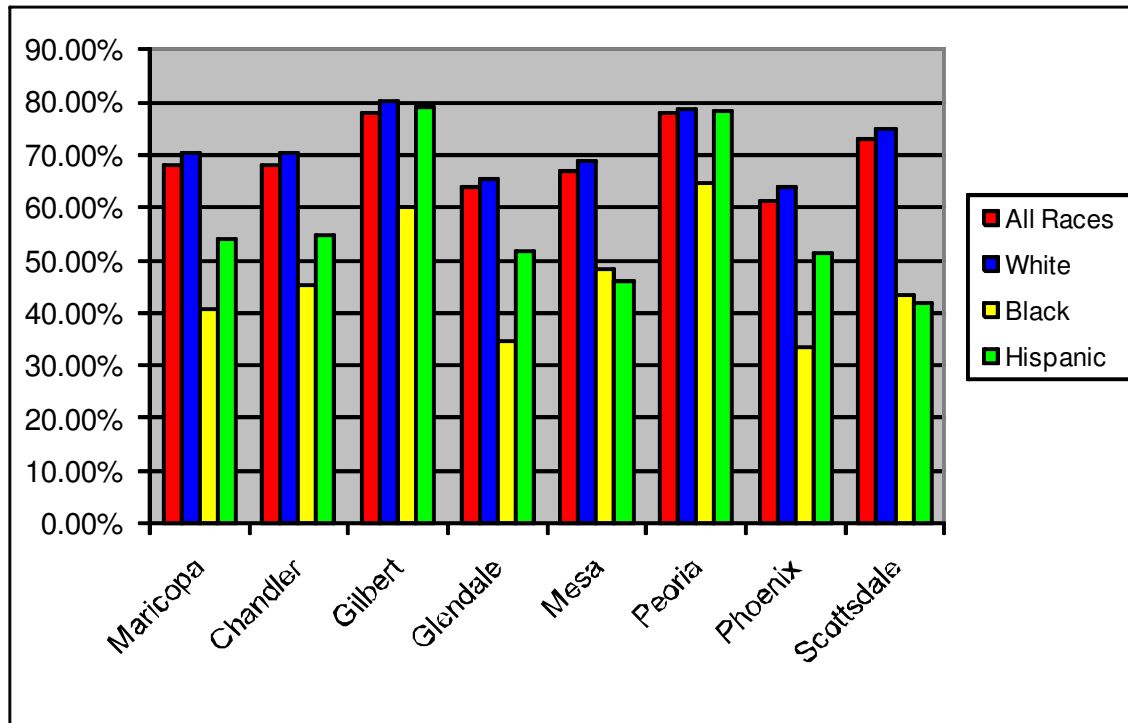
limitations. Although Chandler has not, other Cities in the Phoenix-Mesa-Scottsdale Metropolitan Area have passed similar local ordinances.

Homeownership by Race and Ethnicity

As in most areas of the country, rates of homeownership vary by race/ethnicity in the City of Chandler and its neighboring communities within Maricopa County. The overall rate of homeownership in Chandler, for all races, was 68.0%, matching that of Maricopa County's 68.0%. In Chandler, as in the identified neighboring communities, Whites have the highest rate of homeownership (70.2%), followed by Hispanics/Latinos (54.6%), and then Blacks (45.2%). These homeownership rates were nearly the same as those of Maricopa County as a whole (Whites—70.43%; Hispanic/Latino—54.2%; and Black—40.8%), with the exception of Blacks, who are more often homeowners in Chandler.

The only exception to the pattern occurred within Gilbert and Peoria, where the rates of Hispanic/Latino homeownership were comparable to that of Whites and exceeded the rates of all the communities as a whole. In Gilbert, homeownership rates were Whites—80.1%, Hispanic/Latino—79.3%; and in Peoria White—78.7%; Hispanic/Latino—78.2%. See the below table depicting homeownership rates by race in Chandler and its neighboring communities.

Homeownership Rates by Race/Ethnicity (2008)



Source: U.S. Census Bureau, American Community Survey, (2008)

Recent City Housing Accomplishments

During the past four completed fiscal years, the City of Chandler made considerable progress towards serving the housing needs of the community with the HUD funding available. The City of Chandler has used CDBG, HOME, and more recently, NSP Program funding to provide several housing programs, including:

- Grants for emergency home repairs for homeowners;
- Loans for full rehabilitation of substandard housing; and
- Grants for exterior/interior improvements and ADA retrofitting for the elderly and disabled, and
- Loans for homebuyer assistance.

The table below lists the housing program or type of housing activity undertaken.

City of Chandler Housing Activities FYs 2005 -2010

Housing Activity	2005-06	2006-07	2007-08	2008-09	2009-10
Emergency Repairs	63	61	81	70	91
Exterior/Interior/ADA	107	0	0	0	0
Housing Rehabilitation	12	22	4	4	4
Homeownership Assistance	12	3	2	8	12
TOTAL ASSISTANCE	194	86	87	82	107

Source: City of Chandler, AZ Consolidated Annual and Performance Report for FYs 2005-06; 2006-07; 2007-08; 2008-09; and FY 2009-10.

The table demonstrates that over the 2005–2010 time periods, the City of Chandler utilized Community Development Block Grant (CDBG), HOME Investment Partnership (HOME) Program, and Neighborhood Stabilization Program (NSP) funds to accomplish the following:

- Rehabilitate 46 housing units,
- Emergency Repair of 366 housing units,
- Improve and ADA retrofit 107 housing units; and
- Provide homebuyer assistance or newly construct of 37 households/units.

In addition, the City's Community Development Division partners with the City's Housing and Revitalization Division, which operates as the local public housing authority, to fund certain improvements to the City's public housing stock. Using CDBG funding, projects have been undertaken at public housing sites throughout the City that include roof replacement, grounds improvements, HVAC replacement, electrical improvements, foundation/wall repairs, and sewer water and gas upgrades.

It is estimated by the City that 10 to 15% of the social service activities undertaken by City-funded agencies benefit protected classes, such as the elderly, frail elderly, physically disabled, and developmentally disabled.

On-Going Actions by the City of Chandler to Promote Fair Housing

Chandler reporting documents suggest that low to moderate income Chandler residents experience more discrimination than those with higher incomes because low to moderate income persons feel they have no choice but to accept the discriminatory practices based on their income. Although income is not a protected class under Federal or State of Arizona fair housing law, members of protected classes (minorities, etc.) are more often of low and moderate income.

The City of Chandler, through its Neighborhood Services Division, undertakes actions to promote the awareness of fair housing law and encourage the practice of fair housing. To wit, during FY 2009-10 the City's Community Development Assistant devoted 15% of her time to the following Fair Housing activities:

1. Distributed to the public 350 copies of various pamphlets and other literature including the Fair Housing Brochure and a copy of the resolution adopted by Council. This literature effectively informs residents of basic fair housing rights, and how to detect and report unlawful housing discrimination, and provides the address and telephone number of the Fair Housing Hotline. All brochures and informative materials are available in Spanish and English.
2. For all recipients of assisted housing, a copy of *Fair Housing, It's Your Right, Ten Most Common Mistakes* and a City fair housing complaint form were included in their briefing packet.
3. Maintained a fair housing hotline which was manned by staff until 2009 but now uses a voice mail message to refer callers to the Arizona Attorney General's office.
4. Distributed to housing providers and real estate companies 50 copies of a brochure detailing the *Ten Most Common Fair Housing Mistakes*.
5. Continually provided information on the City's Fair Housing Hotline through the City's water bill, in both English and Spanish.
6. Participated in Arizona Fair Housing Partnership (AZFHP) activities, including attending the monthly meeting; participating in a video on age-restricted housing issues that is viewed at all AZFHP events; staffed a booth at the City of Chandler Homebuyer Fair as a member of the AZFHP; and participated in developing the new information and referral section of the AZFHP web page.
7. Maintained a call log for fair housing complaints and referrals. The City's hotline received 45 calls on fair housing – 41 from tenants and 4 from landlords. Callers were referred to the Arizona Attorney General's Office and the Arizona Fair Housing Center.

Public Housing Authority Policies

Chandler's Housing and Redevelopment Division (CHRD, a division of the City) administers public housing programs, and the Public Housing Authority Commission (PHAC) is the governing authority for matters related to the administration, operation and management of the federal public housing and rental assistance programs administered by the City. The Chandler Public Housing Authority (PHA) operates 303 units of public housing. Public housing is established to provide decent, safe, and sanitary rental housing for eligible families, the elderly, and persons with disabilities. In addition, the PHA administers 480 Section 8 Housing Choice Vouchers. The Section 8 program provides housing assistance to low-income renters and homeowners in the form of rental subsidies.

The Public Housing Authority has seventeen (17), or 6% of housing units designated for persons/households with disabilities, with 1-2% for the hearing and visually impaired. There are 103 scattered single family houses. An additional 4 scattered site homes are designated for elderly tenants and are located in elderly communities. The Chandler PHA certifies that it does not discriminate on a racial/ethnic basis in providing assistance to eligible households between its Public Housing and Housing Voucher Programs. Both the Public Housing and the Housing Voucher Programs of the Chandler PHA have been designated "high performing" by HUD.

CHRD owns and manages the 303 Public Housing units. This provides opportunities for low-income families and elderly household to rent federally subsidized housing for 30% of their monthly-adjusted gross income. The housing inventory is divided into traditional conventional housing, elderly housing and the scattered sites housing programs. There are five (5) conventional housing complexes located in the City of Chandler. There are a total of 200 conventional units. The elderly housing is currently composed of 37 apartments located in the City of Chandler. These apartments house individuals who are 62 years or older. The Scattered Sites housing is currently composed of 103 single-family homes located throughout the City of Chandler. According to the FY 2010-2014 Consolidated Plan, there are 2,608 families on the Public Housing waiting list and 1,023 on the Section 8 waiting list. Average waiting times for Public Housing vary widely depending on several factors including the number of bedrooms required. On average the wait is approximately 2 years for all units, however, two bedroom units are in great demand. Four and five bedroom units have the shortest wait time.

The application process involves two phases:

1. The first is the "initial" application for admission (referred to as a pre-application). This first phase is to determine the family's eligibility for, and placement on, the waiting list. The pre-application will be dated, time-stamped, and referred to the PHA office where the tenant selection and assignment is processed.

2. The second phase is the "final determination of eligibility for admission" (referred as the full application). The full application takes place when the family reaches the top of the waiting list.

At this time, the Public Housing waiting list is open and the PHA ensures that verification of all HUD and PHA eligibility factors is current in order to determine the family's eligibility for an offer of a suitable unit.

In 2006, the Housing Authority opened the Public Housing waiting list for the first time in two and half years. When they opened the waiting list, the information was published in English and Spanish newspapers. Many of their forms and publications are available in English and Spanish.

The primary finding for these programs would be the high demand and need for additional Section 8 vouchers within Chandler. At time of publication, the Section 8 program was not accepting new applications. CHRD advertises by Public Notice when the waiting list re-opens.

City Regulatory Review

The City of Chandler completed a Planning and Zoning Review of Public Policies and Practices to assist with the identification of land use and zoning regulations, practices, and procedures that may act as a barrier to development and the site/use of housing for individuals with disabilities. The following information was garnered from this review:

- The zoning ordinance does not deny housing opportunities for disabled individuals in need of on site supportive services. Planning and zoning code, however, does not include a definition of "disability."
- The jurisdiction's policy does not have a different set of restrictions on the number of unrelated disabled persons residing together than it has for the general population.
- Within the zoning code, once the occupancy exceeds 5 unrelated persons, a use permit is necessary.
- The jurisdiction does not require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants.
- The zoning ordinance does not address mixed uses.
- The zoning ordinance does not describe any areas in this jurisdiction as exclusive.
- The zoning ordinance does contain restrictions for Senior Housing, and such restrictions comply with federal law on housing for older persons.
- The zoning ordinance does not contain any special provisions for making housing accessible to persons with disabilities.
- The zoning ordinance does not include a discussion fair housing. The General Plan acknowledges the goals to provide housing for all needs.
- The jurisdiction follows standards set forth by the American National Standards Institute (ANSI).

According to the FY 2010-2014 Consolidated Plan, the City of Chandler assessed current barriers to affordable housing development by completing the HUD checklist. While affordability isn't a fair housing issue, potential affordable housing barriers are listed here because they could have a disproportional impact on the segment of the population that has the highest number of fair housing complaints. Based on the checklist, the following potential barriers exist:

1. The current zoning ordinance and map, development and subdivision regulations and other land use controls do not conform to the jurisdiction's housing plan by providing sufficient opportunities that permit the building of affordable housing.
2. The City has not adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings.
3. Manufactured (HUD-Code) housing is not permitted "as of right" in all residential districts and zoning classifications in which similar site-built housing is permitted, subject to design, density, building size, foundation requirements, and other similar requirements applicable to other housing, irrespective of the method of production.
4. Within the past five years, the City has not convened or funded comprehensive studies, commissions, or hearings or established a formal ongoing process to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing.
5. Within the past five years, the City has not modified infrastructure standards and/or authorized the use of new infrastructure technologies to significantly reduce the cost of housing.
6. The City does not give "as-of-right" density bonuses sufficient to offset the cost of building below market units as an incentive for any market rate residential development that includes a portion of affordable housing.
7. The City has not established a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental, and related permits.
8. The City does not provide for expedited or "fast track" permitting and approvals for affordable housing projects.
9. The City has not established time limits for government review and approval or disapproval of development permits in which failure to act, after the application is deemed complete, by the government within the designated time period, results in automatic approval.
10. The City does not allow "accessory apartments" either as: a) a special exception or conditional use in all single-family residential zones or, b) "as of right" in a majority of residential districts otherwise zoned for single-family housing.
11. The City does not have an explicit policy that adjusts or waives existing parking requirements for all affordable housing developments.

The City of Chandler completed a General Plan in 2008. Included in that plan were the following recommendations that could affect fair housing choice. The General Plan states that the City should:

- Entertain applications for increased housing density at locations designated for residential use that are in or near growth areas, convenient to transportation or jobs, and responsive to housing market gaps such as affordability.
- Consider permitting residential dwelling units in mixed-use developments as incentives for providing workforce housing, buffering existing neighborhoods, or installing public open space/trails or other highly-desirable features.
- Enable appropriate applications of "innovation zones" in growth areas.
- Take full advantage of the major shift in transportation planning toward public transit and High Capacity Transit Corridors.
- Ensure appropriate levels of public transit.
- Encourage workforce housing in the revitalization/infill and growth expansion node areas.
- Emphasize cooperation with developers who help revitalize neighborhoods, bring well-paying jobs and represent positive cost-benefit for Chandler. Fast track processing may be offered to facilitate the most advantageous applications.
- Participate in affirmative neighborhood activities -- such as agreeing to be represented at the annual Congress of Neighborhoods -- should be expected of all Registered Neighborhood Organizations. Schedule regularly-assigned public safety and code enforcement personnel to maintain contacts with neighborhood groups.
- Publish an expanded "Neighborhood Planning and Redevelopment Primer" (derived from planning process handout materials) for use by citizen groups and property owners. Evaluate neighborhood-generated proposals for consideration in formulating Chandler's annual Capital Improvement Program.
- Assistance should be provided by appropriate City department(s) and others to neighborhood-based groups who wish to plan or set quality guidelines for their area.
- Promote sustainable housing developments including a variety of housing types and higher densities where they may be compatible with adjoining land uses and appropriate in the context of approved area plans, neighborhood plans and/or the General Plan.
- Establish an Affordable Housing consortium consisting of companies and organizations involved in providing shelter. Create incentives, such as density bonuses or transfer of development rights, for builders. Sponsor programs in revitalization areas that would package a number of homes needing residential upgrade or energy-efficiency projects for contractor(s) agreeing to pass along savings to homeowners in return for volume business. Obtain commitments from lending institutions willing to assist low-income families and first-time homebuyers. Arrange and support housing affordability counseling by social service agencies and institutions.

- Report Chandler housing trends regularly (such as at Congress of Neighborhoods conferences) with information on newly available dwelling units and affordability in relation to the employment base. Coordinate with the private sector to provide "match" information on available residential locations, costs, commute times for employers and their employees.
- Provide educational and training programs, such as a neighborhood academy, that focuses on private property maintenance and available assistance. An array of tools should be made available to property owners including grants or loans, technical assistance, even a tool bank for self-help property maintenance.

IV. COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of home loan, community reinvestment and fair housing complaint data. Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data are used in AIs to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist. This section also includes a summary of fair housing legal cases for 2005 to present.

CRA Compliance

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. The Community Reinvestment Act (CRA) requires the FDIC, in connection with the examination of a State nonmember insured financial institution, to assess the institution's CRA performance. A financial institution's performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system. These ratings consist of:

- * Outstanding
- * Satisfactory
- * Needs to Improve
- * Substantial Noncompliance

From 2005 to present, two (2) banks based in Chandler and eight (8) banks based in Phoenix received CRA Performance Ratings. All 10 banks received a rating of "Satisfactory." (Source: <http://www2.fdic.gov/crapes/>)

HMDA Data Analysis

Home Mortgage Disclosure Act (HMDA) data consists of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contains information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data deemed most pertinent to this report and analyzed herein is limited to loan denial rates by location within areas of racial/ethnic and income distinction for loans for 1 – 4 family dwellings and manufactured homes, but excluding data on loan applications for investment purposes (non-owner occupancy). Three types of loan products were included: home-purchase loans (conventional and government-backed), re-financings, and home improvement loans.

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract comprising the City of Chandler. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the City-wide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the Census Tract in which the subject property of the loan was located to identify if there were any discernable patterns that might suggest discriminatory lending practices based on race.

It should be noted that some Census Tracts include areas both within and outside the municipal bounds of the City of Chandler. In best effort to most accurately portray HMDA data for the City, only those tracts were utilized which were either entirely within the City or whose area fell predominantly within City boundaries. Certain tracts where only a small area fell within the City boundaries were excluded from the calculations. It should be noted discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas.

General Loan Application Data

The most recent available HMDA data was for the 2008 calendar year and utilized in this analysis (extracted from HMDA Aggregate Table 1, 2008). In summary, among the Census Tracts analyzed, there were 13,447 loan applications made for purchase, refinancing, or improvement of owner occupied homes. Of this total, 3,425 applications were denied (25.5%). Appendix 1 provides a detailed table of the HMDA data discussed herein by Census Tract.

Analysis of Denial Rates for Minority Census Tracts

For purposes of this analysis, a “minority” tract is defined as a Census Tract where the minority concentration is at least ten percent (10%) greater than that of the City of Chandler as a whole (21%). Therefore, Tracts with 31% or greater minority population were considered “minority”.

Among all thirty-nine (39) identified Chandler Tracts, nine (9) or 23% met the definition of “minority”. Of these, 100% had an application denial rate higher than that of the City as a whole (25.5%). Collectively, among these “minority” Tracts there were 2,182 loan applications and 771 denials, equating to a denial rate of 35.3%, which exceeds that of the City by approximately 10%. This is a significant variance, and at face value, would appear to indicate discrimination in lending based on property location in areas of minority concentration. However, inclusion of income characteristics in the analysis yields a different conclusion.

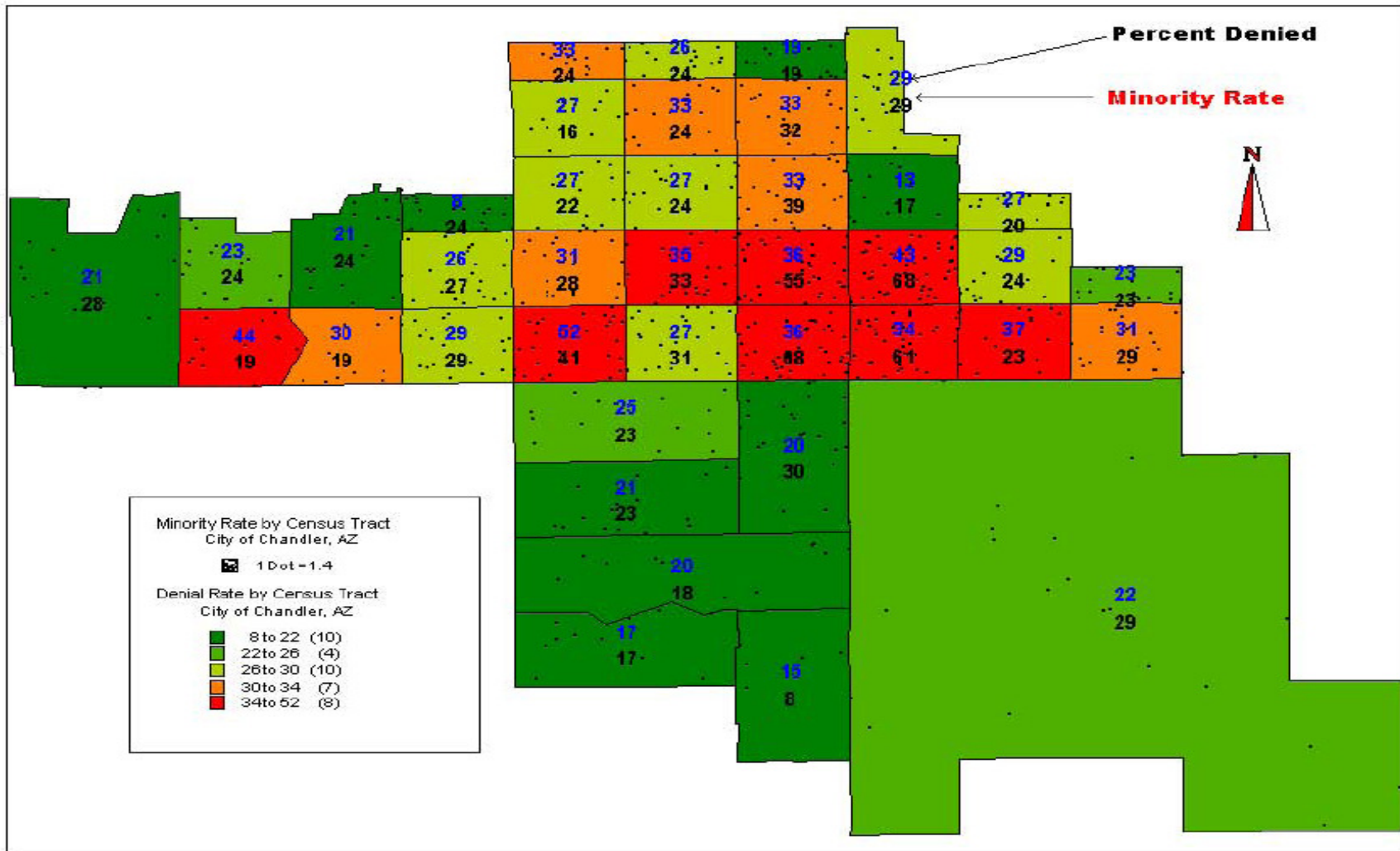
As was previously noted, the City of Chandler exhibits a median income higher than that of the Phoenix-Mesa-Scottsdale MSA. Accordingly, the majority of

Tracts within Chandler exhibit median incomes greater than that of the MSA. Only six (6) or 15% of Chandler Tracts had median incomes lesser than that of the MSA, and moreover, only two (2) Tracts (5.1%) met HUD's definition of low- and moderate income (not greater than 80% Area Median Income).

Of note was the frequent coincidence of "minority" Tracts with Tracts whose median income, as a percentage of the MSA median income, was lower than that of the City as a whole. Among Chandler's "minority" Tracts, six (6) or 67% had incomes lower than the MSA median, and eight (8) or 89% had incomes lower than the City median.

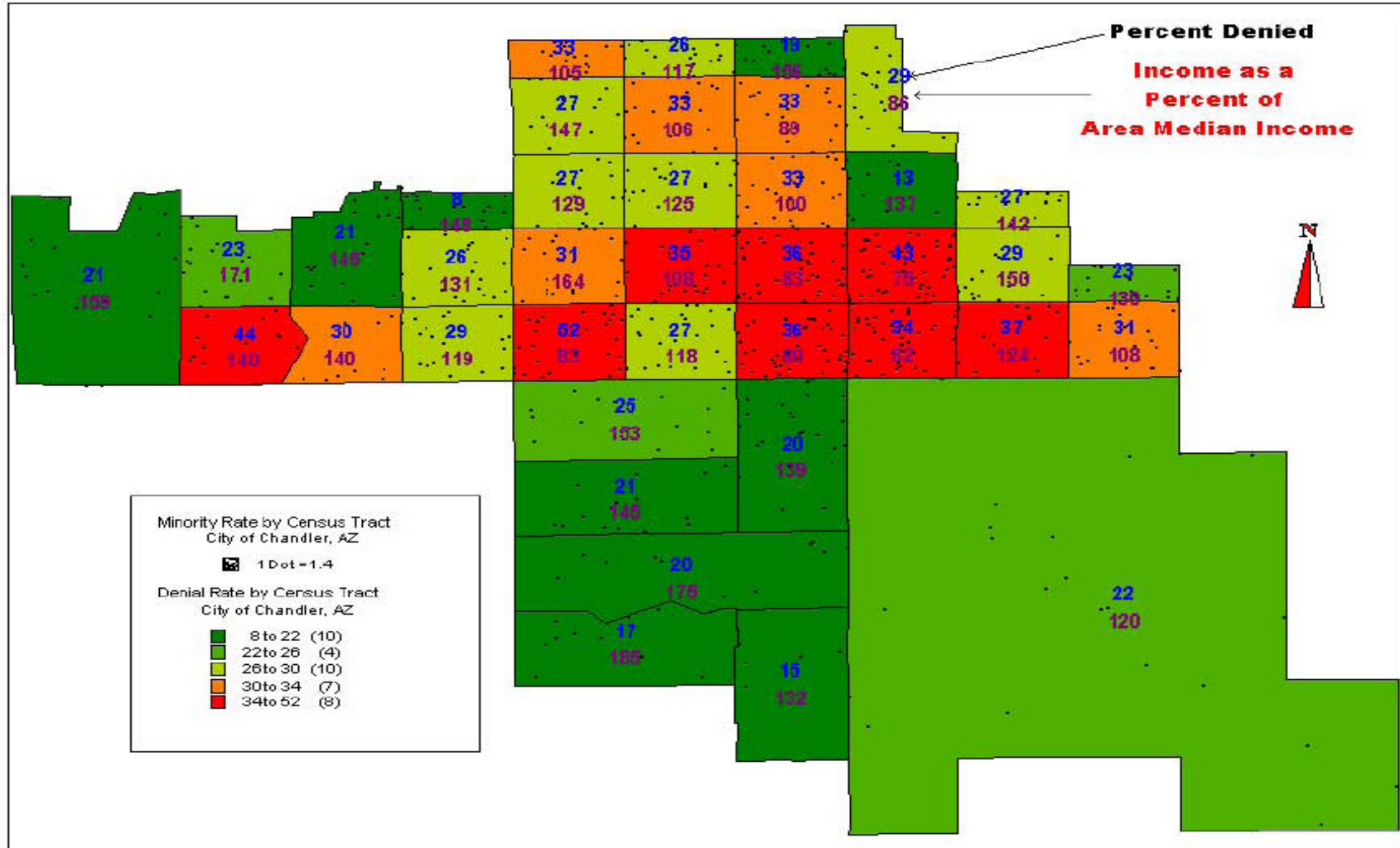
In looking at all thirty-nine (39) Chandler Tracts in the analysis, twenty-five (25) or 64% had denial rates higher than the City average. "Minority" Tracts with comparable median incomes to non-minority Tracts had comparable loan application denial rates. Further, the data shows that the Tracts with the highest denial rates also had the lowest median incomes. Among all Tracts, the 25% with the lowest median income were also the 25% with the highest denial rates. Conversely, the Tracts with the highest median incomes were more likely to have the lowest denial rates. Overall, this would indicate that the elevated denial rate in "minority" Tracts is based more on the lower income characteristics of these Tracts rather than their racial/ethnic characteristics. The HMDA data does not indicate discrimination in lending based on race/ethnicity characteristics of property area location within Chandler, however, a definitive conclusion would require a greater degree of analysis taking into consideration additional data not available from HMDA at the geographic level specific to Chandler. More specific HMDA data was; however, available for the Phoenix-Scottsdale-Mesa MSA, and discussion follows the Chandler HMDA data maps on the next pages.

Loan Application Denial Rate by Census Tract Minority Concentration, City of Chandler



Source: Extracted from HMDA, Aggregate Table 1, 2008.

Loan Application Denial Rate by Census Tract Income, City of Chandler



Source: Extracted from HMDA, Aggregate Table 1, 2008.

Data for Phoenix-Scottsdale-Mesa MSA

The HMDA data for the Phoenix-Scottsdale-Mesa MSA was provided in a format that permitted a more detailed analysis in terms of originations by specific level of minority concentration and by specific level of income within Census Tract of property location.

In total (all loan products combined -- conventional loans, re-financings, and home improvement loans for 1–4 family and manufactured home dwellings) there were significant variances in rates of loan origination between tracts of different minority compositions. Rates of loan origination were 53.7% in tracts with less than 10% minority composition; 47.9% in tracts with 10 – 19% minority composition; 42.1% in tracts with 20 – 49% minority composition; 32.4% in tracts with 50 – 79% minority composition; and 26.3% in tracts with 80 to 100% minority composition. This data reveals the higher the concentration of minorities in a Census Tract, the lower the rate of originations, or a negative correlation between origination rates and minority composition of the property location.

Loan Origination Rates by Minority Concentration in a Census Tract of Property Location, Phoenix-Mesa-Scottsdale MSA

<u>Racial Composition</u>	Total, All Loan Products		
	Applications	Originations	%
Less than 10% Minority	32,285	17,327	53.7%
10 – 19% Minority	52,727	25,236	47.9%
20 – 49% Minority	77,589	32,675	42.1%
50 – 79% Minority	29,142	9,435	32.4%
80 – 100% Minority	8,191	2,157	26.3%

Source: HMDA Aggregate Table 7-2, 2008

There were also significant variances in the rates of loan origination between lower-income and higher income census tracts. Rates of loan origination were 28.9% in the low income tracts, 33.7% in the moderate income tracts, 41.9% in the middle income tracts, and 51.2% in the upper income tracts. This data reveals that the lower the income characteristic of the census tract, the lower the rate of loan origination, or a positive correlation between rate of loan origination and income characteristic of the property location.

**Loan Origination Rates by Income Characteristic in a Census Tract of
Property Location, Phoenix-Mesa-Scottsdale MSA**

Total, All Loan Products			
Income Characteristics	Applications	Originations	%
Low Income	2,988	863	28.9%
Moderate Income	42,918	14,473	33.7%
Middle Income	79,553	33,344	41.9%
Upper Income	74,428	38,133	51.2%

Source: HMDA Aggregate Table 7-2, 2008

This data indicates a certain degree of discrimination in lending based on minority racial/ethnic characteristics of the property location, however, definitive conclusion would require a greater degree of statistical analysis taking into consideration other applicant characteristic factors effecting underwriting decisions.

Foreclosure Data

The southwestern region of the United States, in particular the State of Arizona and the Phoenix-Mesa-Scottsdale MSA has been particularly hard hit by the recent home foreclosure crisis. Unfortunately, the City of Chandler was not spared the damaging effects of this trend. Realtytrac.com is recognized as the most comprehensive one-stop source of comprehensive source of foreclosure data. The system was utilized to generate the figures cited herein, to include homes in pre-foreclosure, at auction, and bank-owned (REO) properties. As of September 15, 2010, the City of Chandler had 2,582 single-family housing units in foreclosure, or three percent (3.0%) of the City's housing stock. Foreclosures include all for-sale housing unit types (single-family attached/detached and condominium) in pre-foreclosure, bank ownership, or up for auction. This rate is not as severe as that of neighboring communities, but has still had a detrimental impact on neighborhood viability.

The following foreclosure data was obtained by RealtyTrac.com and is presented as was it was available, by zip code. It must be noted that although U.S. Postal Service information indicates a zip code 85286 located in the central portion of Chandler, extending from east to west generally south of the Loop 202 Freeway, RealtyTrac data contains no information for zip code 85286, but rather extends zip codes 85248 and 85249 northward to include the geographic area encompassed by 85286, and the corresponding foreclosure data that would otherwise be included in zip code 85286. Furthermore, it should be noted that certain zip codes, particularly 85226 and 85248 include unincorporated areas lying outside of the municipal bounds of Chandler extending towards the I-10/Maricopa Freeway. The unincorporated area portions do not appear to significantly alter the municipal results of the City of Chandler. It should also be

mentioned that there are two (2) zip codes for Chandler dedicated strictly to Post Office Box addresses, and have no bearing on foreclosure data.

Number of Foreclosures by Zip Codes and Proportion in City of Chandler

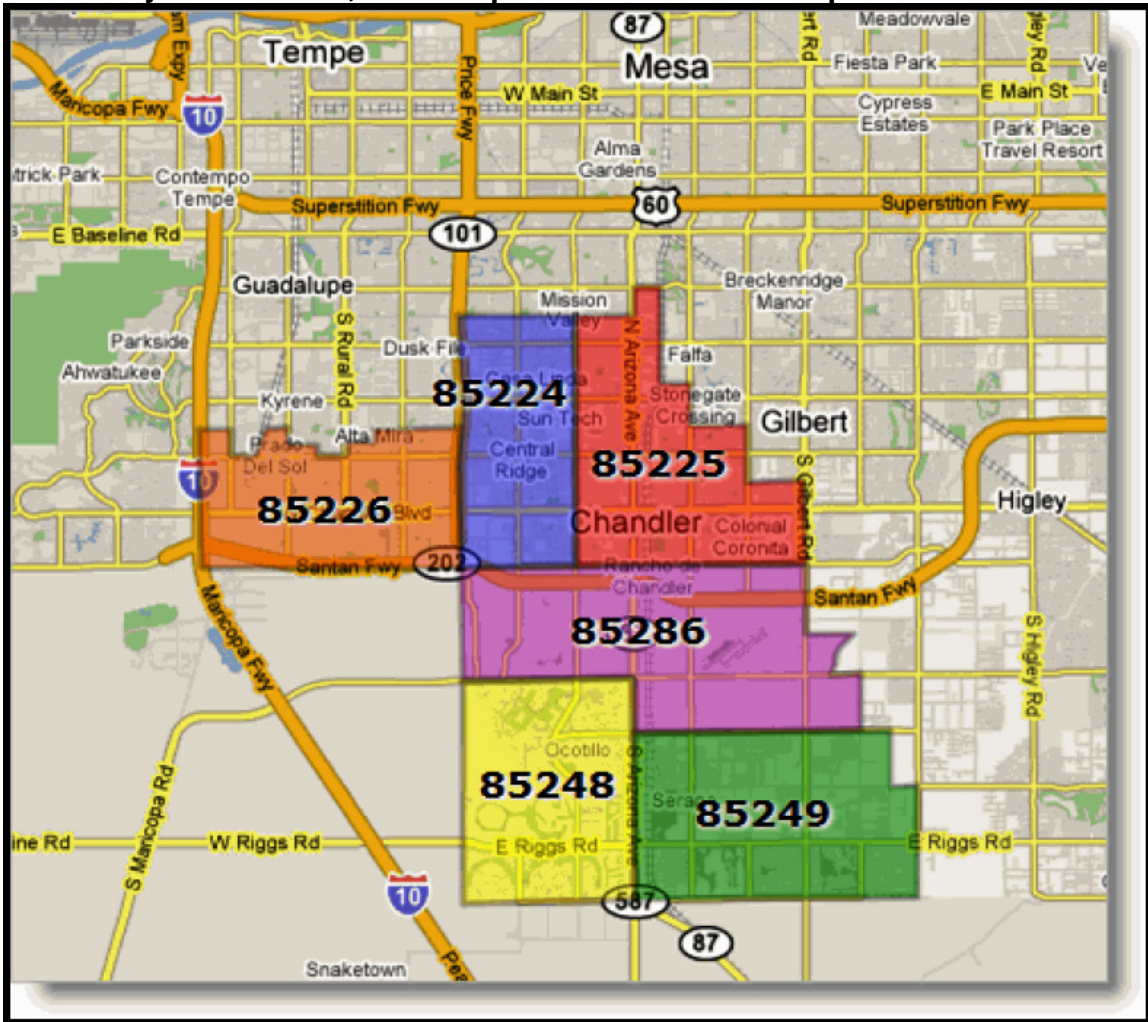
85224	85225	85226	85248	85249	85286	TOTAL
656	747	285	298	596	***	2,582
25.4%	28.9%	11.0%	11.5%	23.1%	***	100%

Source: RealtyTrac, www.RealtyTrac.com, September 15, 2010

Of the five (5) analyzed zip codes constituting the City of Chandler, the largest numbers of foreclosures were concentrated in zip codes 85225 (747—28.9%); 85224 (656—25.4%); and 85249 (596—23.1%). A zip code map for the City of Chandler is shown on the following page to help the reader identify the general locations of the areas of higher foreclosure.

Although the highest incidence and rate of foreclosures occur in the areas of the City with the greatest minority and lower-income concentration, the available data is not sufficient to draw a link to predatory lending practices in such areas that would lead to the elevated rates of foreclosure.

City of Chandler, USPS Zip Codes within Municipal Boundaries



Source: U.S. Postal Service

The two above-mentioned zip codes with the highest numbers of foreclosures, 85224 and 85225 encompass the north-central and northeastern portions of the Chandler, including the downtown area. Together they represent 1,403 foreclosures, or 54% of the City total. The zip code with the third largest number of foreclosures, 85249 is located in the southeastern part of the City and represents 596 units or 23.1% of the City total. It should not be forgotten that the RealtyTrac data has extended this zip code northward to approximately the Loop 202 Freeway. The impact of foreclosures, even at modest amounts, can be devastating in terms of negative impact on property values, abandonment of property maintenance, fragmentation of neighborhood community members, and an overall destabilizing and blighting effect.

The zip code with the single highest number of foreclosures is 85225, with 747 foreclosures, or 28.9% of the City total. This is located in the central downtown area of Chandler and its adjacent neighborhoods, which also happen to be the largest areas of lower income concentration in the City.

Fair Housing Complaint Data

The Arizona Fair Housing Act (AFHA) of 1991 (ARS § 41.1491) provides the same substantive protections as the Federal Fair Housing Act; however, it provides different procedures for the administrative complaint processing. The AFHA also amended the Arizona Landlord and Tenant Act to bring it into compliance with the State Fair Housing Statute. Because AFHA is essentially the same as the FHA, and the Arizona Attorney General has both the administrative capability and fiscal ability to carry out the law, Arizona law has been federally designated as “Substantially Equivalent.” As a result of this designation, under the Federal Fair Housing Assistance Program (FHAP), HUD contracts with the Arizona Attorney General’s (AG) Civil Rights Division to investigate and rule on many fair housing cases on its behalf.

Citizens of Chandler who believe they have experienced fair housing discrimination may file their complaints through the following entities: the Arizona Attorney General’s office, HUD’s Office of Fair Housing and Opportunity (FHEO), the Arizona Fair Housing Center, and the Southwest Fair Housing Council. Arizona State Law gives the Arizona Attorney General administrative authority over the Fair Housing Act, including taking and investigating complaints. However, the Attorney General may refer complaints to organizations in the State with substantial equivalency (determined by HUD) and/or towns or cities in Arizona of more than 350,000 persons that have adopted a local fair housing ordinance. As part of the AI, these organizations were contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Chandler.

Arizona Attorney General, Civil Rights Division

The Arizona Attorney General Civil Rights Division investigates and resolves housing discrimination complaints. It also mediates and conciliates complaints and can bring legal action on an individual’s behalf if no solution can be found prior to litigation being initiated. Most housing discrimination charges filed with the Attorney General’s (AG) Office are considered to be dual-filed with the United States Department of Housing and Urban Development (HUD). There is no cost to file a housing discrimination complaint with the Civil Rights Division or HUD. Fair housing complaints must be filed within one year after the discriminatory act(s).

The following tables illustrate all fair housing complaints involving properties in Chandler, as investigated by the Arizona AG’s office. The tables show complaints in two sets: 2000 to 2005 and 2006 to present, along with the basis of the complaint, description, and reason for closure. Based on the fair housing complaint data included in these tables, it is evident that over half of all fair housing complaints handled by the AG’s office are deemed to have a “no cause” determination.

Fair Housing Complaints Involving Properties in Chandler, Arizona
January 1, 2000 through December 31, 2005

	HUD Date Filed	F = FHAP Processed H = HUD Processed	Basis	Description of Complaint	Date Closed by HUD	Why File Was Closed/ Resolution
1	08/23/2000	F	Color, National Origin, Retaliation	Discrimination in terms/conditions/privileges relating to rental. Discriminatory acts under Section 818.	02/30/2001	Conciliation/ settlement successful.
2	10/20/2000	F	Race, Religion, Retaliation	Discrimination in terms and conditions of membership.	12/31/2001	No cause determination.
3	04/17/2001	F	Sex	Discrimination in the purchasing of loans.	06/22/2001	No cause determination
4	06/22/2001	F	Religion	Discrimination in terms/conditions/privileges relating to rental.	04/23/2003	No cause determination.
5	06/27/2001	F	Disability	Discrimination in the making of loans.	06/20/2003	No cause determination.
6	11/26/2001	F	Disability	Discriminatory advertising, statements, and notices. Discrimination in terms/conditions/privileges relating to rental. Discriminatory actions under Section 818.	06/26/2002	No cause determination.
7	01/07/2001	F	Disability	Failure to provide accessible and usable public and common user areas. Failure to make reasonable accommodation.	05/22/2002	No cause determination.
8	03/26/2002	F	Race	Discriminatory refusal to rent and negotiate for rental. Discrimination in terms/conditions/privileges relating to rental.	08/01/2003	No cause determination.
9	04/15/2002	F	Race	Discrimination in the selling of residential real property. Discrimination in terms/conditions/ privileges relating to rental. Use of discriminatory indicators.	12/12/2003	No cause determination.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

10	08/26/2002	F	Disability	Failure to make reasonable accommodation.	02/09/2004	No cause determination.
11	10/08/2002	F	Disability	Discrimination in terms/conditions/privileges relating to rental. Failure to make reasonable accommodation.	04/23/2003	Complaint withdrawn by complainant after resolution.
12	02/21/2003	H	Disability	Discriminatory advertising, statements, and notices. Discrimination in terms/conditions/privileges relating to rental. Failure to make reasonable accommodation.	04/14/2003	Conciliation/settlement successful.
13	05/15/2003	H	Disability	Failure to make reasonable accommodation.	05/20/2004	Conciliation/settlement successful.
14	05/21/2003	F	Disability	Failure to make reasonable accommodation.	03/29/2004	No cause determination.
15	07/24/2003	F	Race, Family Status	Discriminatory refusal to rent and negotiate for rental.	08/09/2004	No cause determination.
16	10/06/2003	F	Disability	Failure to permit reasonable accommodation.	08/19/2004	Conciliation/settlement successful.
17	08/24/2004	F	Race, National Origin	Discrimination in terms/conditions/privileges relating to sale.	04/26/2005	No cause determination.
18	09/09/2004	F	Race, National Origin	Discrimination in terms/conditions/privileges relating to sale. Use of discriminatory indicators.	04/26/2005	No cause determination.
19	09/20/2004	F	Disability	Discrimination in terms/conditions/privileges relating to rental. Failure to make reasonable accommodation.	01/25/2005	No cause determination.
20	09/30/2004	F	Race, Color, National Origin	Discrimination in terms/conditions/privileges relating to sale.	04/26/2005	No cause determination.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

21	11/19/2004	F	Race	Discriminatory refusal to sell and negotiate for sale. Discriminatory advertising, statements and notices. Discriminatory financing. Discriminatory acts under Section 818.	05/06/2005	No cause determination.
22	01/20/2005	F	National Origin	Discriminatory terms, conditions, privileges, or services and facilities.	07/11/2005	No cause determination
23	10/05/2005	F	National Origin	Discriminatory terms, conditions, privileges, or services and facilities.	12/12/2005	Complainant failed to cooperate.

Source: Arizona Attorney General, Civil Rights Division

Fair Housing Complaints Involving Properties in Chandler, Arizona
January 1, 2006 through August 31, 2010

	HUD Date Filed	F = FHAP Processed H = HUD Processed	Basis	Description of Complaint	Date Closed by HUD	Why File Was Closed/ Resolution
1	02/09/2006	F	Disability	Non-compliance with design and construction requirements.	06/12/2006	No cause determination.
2	02/09/2006	F	Disability	Non-compliance with design and construction requirements.	06/14/2006	Conciliation/ settlement successful.
3	02/10/2006	F	Religion	Discriminatory acts under Section 818.	06/28/2006	No cause determination.
4	03/14/2006	F	Disability	Failure to make reasonable accommodation.	07/10/2006	No cause determination.
5	06/20/2006	F	Disability	Discriminatory refusal to rent and negotiate for rental. Failure to make reasonable accommodation.	12/09/2008	FHAP judicial consent order
6	07/31/2006	F	Religion	Discrimination in services and facilities relating to sale.	01/31/2007	Conciliation/ settlement successful.
7	10/10/2006	F	Disability	Non-compliance with design and construction requirements.	05/08/2007	Conciliation/ settlement successful.
8	11/08/2006	F	Disability	Non-compliance with design and construction requirements.	04/18/2007	Conciliation/ settlement successful.
9	11/08/2006	F	Disability	Non-compliance with design and construction requirements.	02/28/2007	Conciliation/ settlement successful.
10	01/05/2007	F	Disability	Non-compliance with design and construction requirements.	12/09/2008	FHAP judicial consent order.
11	03/21/2007	F	National Origin, Retaliation	Discriminatory terms, conditions, privileges or services and facilities	05/14/2007	No cause determination.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

12	05/22/2007	F	National Origin	Discriminatory refusal to rent	09/17/2007	No cause determination.
13	03/28/2008	F	Family Status	Discrimination in terms/condition/privileges relating to rental.	04/07/2008	Complaint withdrawn by complainant after resolution
14	05/22/2008	F	National Origin	Discriminatory refusal to rent and negotiate for rental. Discrimination in terms/conditions/privileges relating to rental.	07/08/2008	No cause determination.
15	06/25/2008	F	Disability	Discriminatory terms, conditions, privileges, or services and facilities.	09/22/2008	No cause determination.
16	06/30/2008	F	National Origin	Discrimination in the purchasing of loans.	11/25/2008	Conciliation/settlement successful.
17	07/17/2008	F	Sex	Discrimination in terms/conditions/privileges relating to rental. Other discriminatory act.	10/14/2008	No cause determination.
18	12/09/2008	F	Family Status	Discriminatory advertising, statements, and notices.	03/10/2009	No cause determination.
19	02/25/2009	F	Sex	Discrimination in terms/conditions/privileges relating to rental.	05/27/2009	No cause determination.
20	03/27/2009	F	Retaliation	Discriminatory acts under Section 818.	06/15/2009	No cause determination.
21	05/26/2009	F	Other National Origin	Discriminatory advertising, statements and notices. Discriminatory terms, conditions, privileges, or services and facilities. Discriminatory acts under Section 818.	10/23/2009	No cause determination.
22	08/06/2009	F	Race, Other National Origin, Retaliation	Discriminatory refusal to rent and negotiate for rental.	10/05/2009	Conciliation/settlement successful.
23	09/08/2009	F	Disability	Failure to make reasonable accommodation.	01/20/2010	No cause determination.
24	12/23/2009	F	Retaliation	Discriminatory advertising, statements, and notices. Discriminatory terms, conditions, privileges, or services and facilities. Discriminatory acts under Section 818.	04/05/2010	No cause determination.
25	12/23/2009	F	Disability	Discriminatory terms, conditions, privileges, or services and facilities.	04/05/2010	No cause determination.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

26	03/04/2010	H	Sex	Discriminatory refusal to rent. Discriminatory terms, conditions, privileges, or services and facilities.	07/06/2010	Conciliation/ settlement successful.
27	04/16/2010	H	Disability	Failure to permit reasonable accommodation. Failure to make reasonable accommodation.	06/17/2010	Conciliation/ settlement successful.
28	06/24/2010	F	Race	Other discriminatory acts.	pending	pending
29	06/20/2010	F	Race	Discriminatory refusal to rent and negotiate for rental.	pending	pending

Source: Arizona Attorney General, Civil Rights Division

Fair Housing Hotline

The City of Chandler operated a Fair Housing Hotline and handled fair housing calls and complaints between 2007 and 2009. The Hotline reported 3 fair housing cases that were handled by the City. After the end of 2009, all calls are referred to the AG's office. At this time, referred calls are processed by the AG's office and not tracked separately.

Mediation

Solve-It! Mediation is a program of the Leadership Centre, a non-profit 501(c)(3) that provides Arizona residents with information, resources and tools that create and support effective community leaders. The City of Chandler funded mediation services by Solve It! Mediation Group in FY 2009. Although the scope of work did not specifically include fair housing mediation, Solve It! may have provided fair housing mediation services during that time. At the time of this publication, Solve It! had not provided specific data regarding the services they provided to Chandler residents.

Southwest Fair Housing Council

The City of Chandler provided one-year, in-kind support for the work of the Southwest Fair Housing Council (SWFHC), through the 2009 HUD Education and Outreach Initiative (EOI) program grants. SWFHC is a non-profit agency funded by memberships, donations, HUD, the Arizona Department of Housing, and CDBG funding. SWFHC works to ensure fair housing by providing a variety of free services directed toward education and enforcement:

- Investigating individual complaints of housing discrimination;
 - Obtaining evidence to support enforcement action by public agencies conducting legal or administrative actions;
 - Initiating complaints and litigation to serve fair housing goals;
 - Informing and advising community residents of their fair housing rights, including presentations at community meetings and special events;
 - Conducting mediations;
 - Conducting conferences, training programs, and seminars to inform housing professionals about housing laws;
 - Assisting businesses, neighborhood groups, agencies, and units of government in the development of fair housing goals, plans and strategies, and actions; and
 - Providing information and referrals for persons and families with housing needs.
- (Source: <http://www.swfhc.com/about.htm>)

SWFHC handled 3 fair housing disputes, working in conjunction with City of Chandler staff, to determine a resolution.

Community Legal Services

Community Legal Services (CLS) is a not-for-profit Arizona law firm incorporated in 1952 as a legal aid program organized to promote equal access to justice for all. According to the CLS Housing and Foreclosure Law Project – Maricopa County (East Valley Office), CLS has provided services and support for fair housing questions and/or disputes in the City of Chandler. In the last four years, CLS has assisted four applicants to the Chandler Section 8 program that had fair housing complaints. CLS participated in

informal hearings to resolve these complaints. CLS has also provided outreach or public education efforts regarding fair housing to residents of Chandler in conjunction with the AG's office.

Legal Cases

According to the Arizona AG's Office, the AG Civil Rights Division has litigated one lawsuit involving property in Chandler since 2005.

State of Arizona v. AIMCO

This housing discrimination lawsuit was filed by the State of Arizona against AIMCO, LP and AIMCO Las Arboles LP, to resolve allegations that the Chandler property refused to make reasonable accommodations for persons with disabilities. AIMCO is the largest owner and operator of apartment communities in the United States.

AIMCO denied the application of a prospective tenant because of the applicant's inability to meet the community's income requirements. The applicant's parents were willing to co-sign for the apartment, but AIMCO management refused this offer based on their policy of only allowing full-time students to use co-signers to qualify for apartments.

The Arizona Fair Housing Act requires housing providers who operate apartment complexes to make reasonable accommodations in their rules, policies, or practices when necessary to allow a person with a disability to have an equal opportunity to use and enjoy housing.

Under the terms of the settlement, in the form of a consent decree, AIMCO will adopt a nationwide policy that allows a qualified applicant or tenant to use a co-signer when, because of the disability, the applicant or tenant cannot meet the financial qualification criteria.

The policy will apply to all AIMCO residential rental properties throughout the country and will be reflected in the company's operating manual. The company also agreed to include the revision in online training used by all AIMCO residential rental properties throughout the U.S. The settlement requires AIMCO management entities to provide training regarding the new fair housing curriculum to all supervisors, managers, and employees who accept inquiries from prospective tenants and residents at AIMCO properties.

(Source: Office of Arizona Attorney General and Attorney General Press Release, dated June 28, 2007)

V. PUBLIC OUTREACH

Introduction

This section summarizes the results of the surveys, public meetings, and key person interviews conducted as part of the public outreach process for the City of Chandler AI. In addition, this section gives a brief overview of fair housing public outreach conducted by stakeholders in Chandler. The consultant conducted an online and written survey available to all Chandler residents and industry stakeholders. The survey asked respondents about their experience and perception of housing discrimination, knowledge of fair housing laws, utilization of Chandler's housing assistance and social service programs, and opinions about housing and social service needs in the city. ASK also directly administered surveys, conducted public meetings, and held key person interviews with members of the Housing and Human Services Commission, community groups, City of Chandler staff, nonprofit agencies, and area real estate agents.

ASK developed fair housing surveys for citizens, housing service providers, Realtors, and lending institutions. Copies of the survey were available in Spanish. A fair housing survey link was posted on the City's Community Development Division website and sent to all Commission Liaisons, Boards and Committees. Surveys were distributed to Chandler Non-Profit Coalition Members. In addition, City Community Development staff distributed surveys by hand at the following community locations and events:

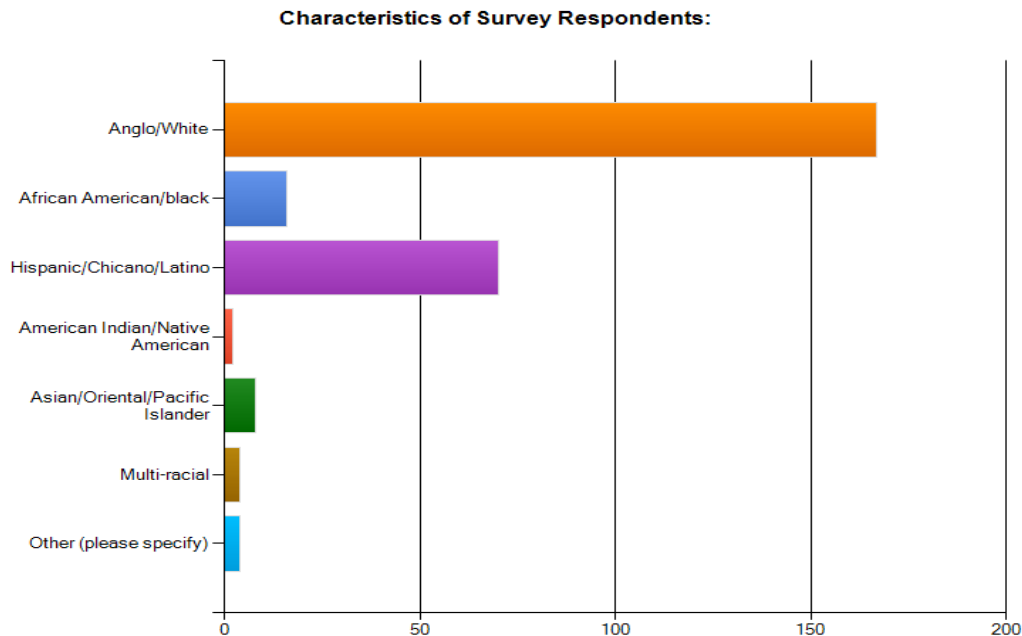
- Neighborhood Advisory Committee Monthly Meeting, September 14, 2010, Knox Elementary School
- HOA Academy at the Chandler Police Department Community Room, September 9, 2010
- Housing Rehabilitation Program Outreach Meeting, Humphrey School – Colonia Cornita Neighborhood, August 30, 2010
- Housing Rehabilitation Program Outreach Meeting, Knox Elementary School – Amberwood Neighborhood, September 13, 2010
- Housing Rehabilitation Program Outreach Meeting, Chandler Regional Hospital – Green Valley Neighborhood, September 15, 2010
- Chandler Christian Community Center, September 15-17, 2010
- Chandler CARE Center, September 15-24, 2010

Please refer to the Appendix section of the AI to view the survey instruments. The findings from these activities are discussed below.

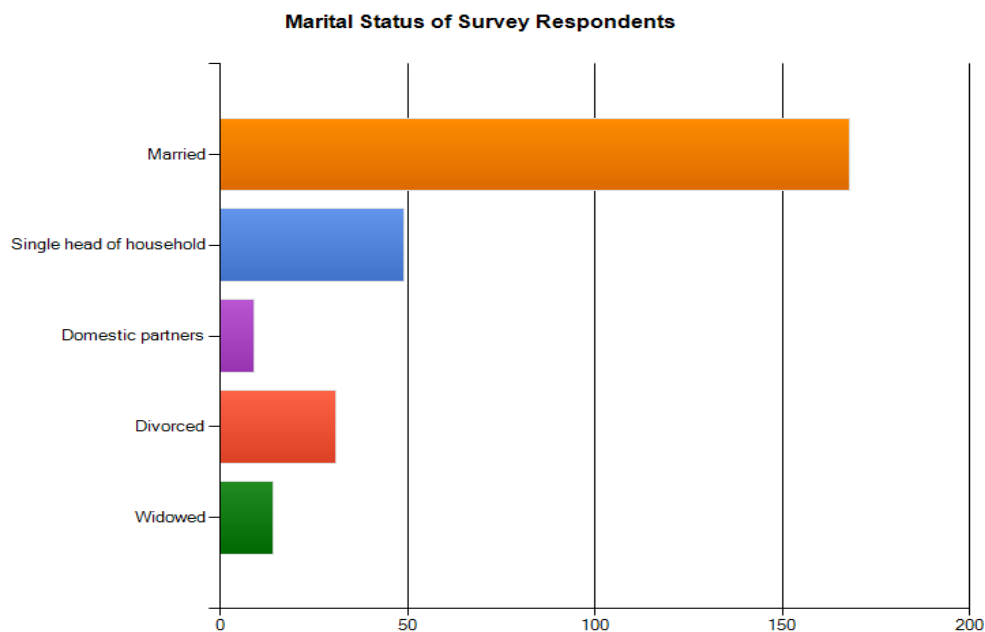
Citizen Surveys

An online, 30-question fair housing survey was designed by ASK and available for all residents to complete via <http://www.surveymonkey.com>. The survey was also distributed by City of Chandler staff, available in English and Spanish. The survey was open in the month of September and was completed by 275 Chandler residents, 98 of which completed the survey online. Thirty-five (35) of the surveys were completed in Spanish, and results were translated for compilation.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

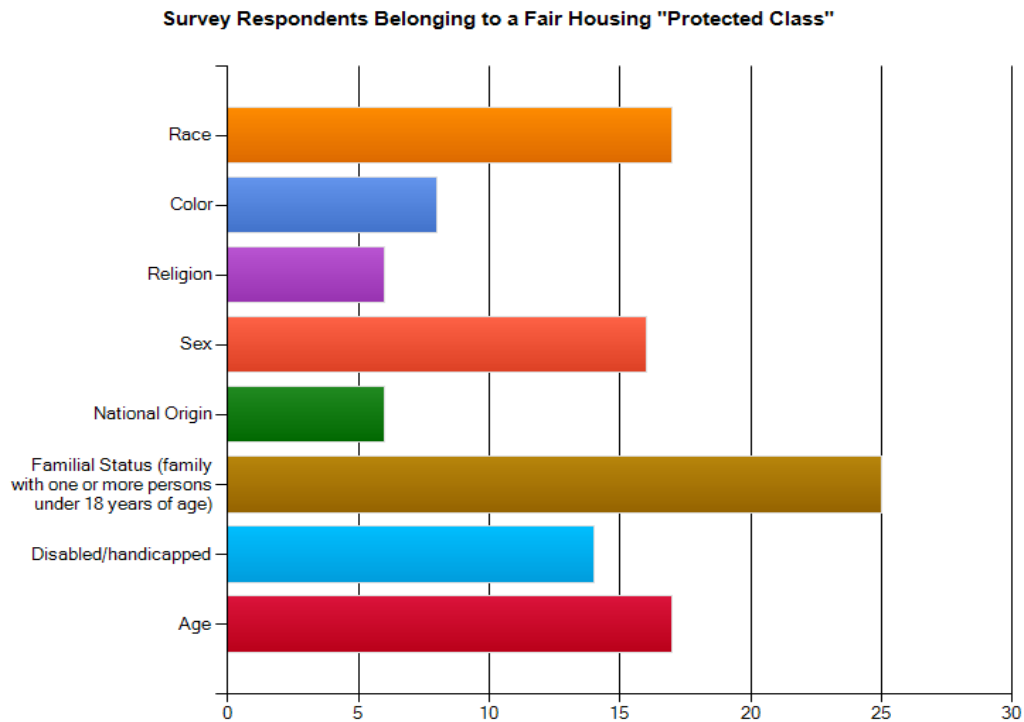


Of the citizens surveyed, 167 persons (62%) are White, 16 (6%) are Black, 70 (26%) Hispanic, 2 (0.7%) are American Indian, 8 (3%) are Asian, 4 (1.5%) are Multi-racial, and 4 (1.5%) are other races. This compares relatively closely to the racial makeup of Chandler: White (78.1%), Black (5.1%), Hispanic (36%), American Indian (1.3%), Asian (3.1%), two or more races (2.7%), and other races (9.7%).

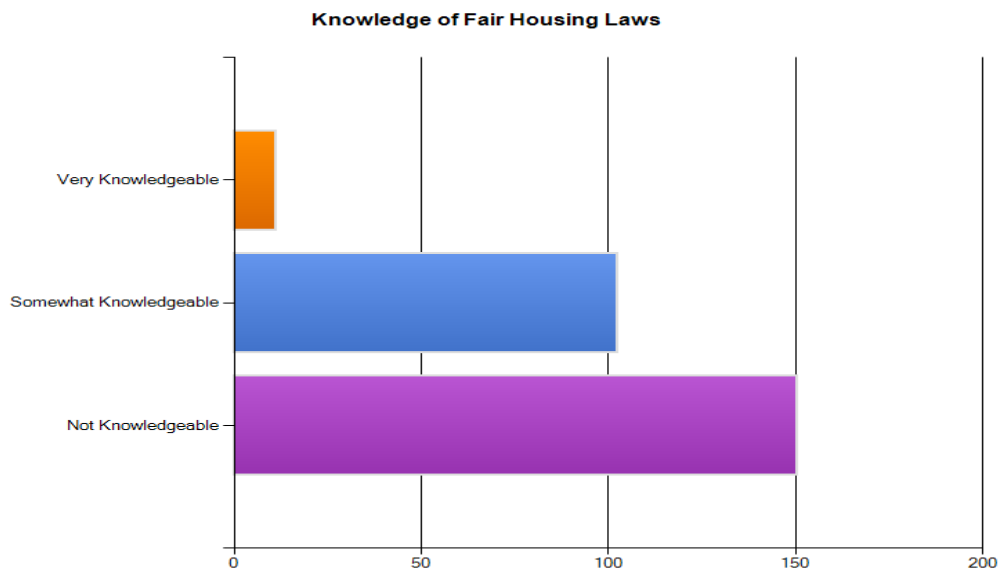


Of the citizens surveyed, 168 persons (62%) are married, 48 (18%) are single head of household, 9 (3%) are domestic partners, 31 (11%) are divorced, and 14 (5%) are widowed.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011



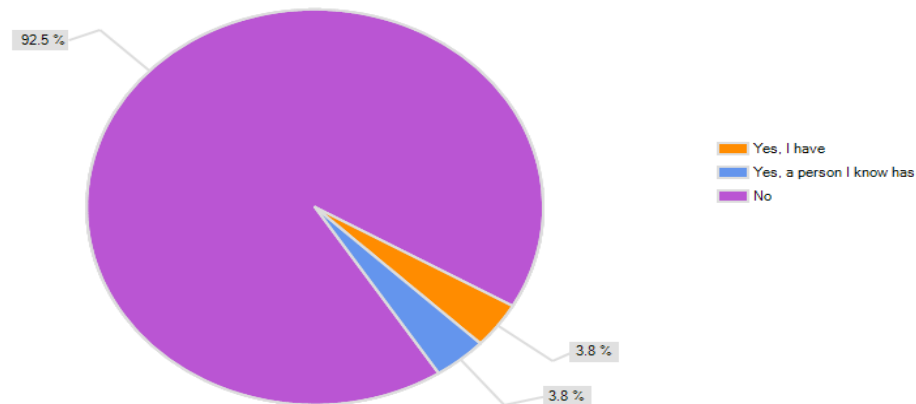
Of the 64 survey respondents that considered their household to belong to a “protected class,” the classification breakdown is as follows: 17 (27%) self-identified by Race; 8 (13%) by Color; 6 (9%) by Religion; 16 (25%) by Sex; 6 (9%) by National Origin; 25 (39%) by Familial Status; 14 (22%) by Disability; and 17 (27%) by Age.



Of the 263 respondents that answered the question regarding Fair Housing laws, only 11 (4%) consider themselves to be Very Knowledgeable, 102 (39%) are Somewhat Knowledgeable, and 150 (57%) are Not Knowledgeable.

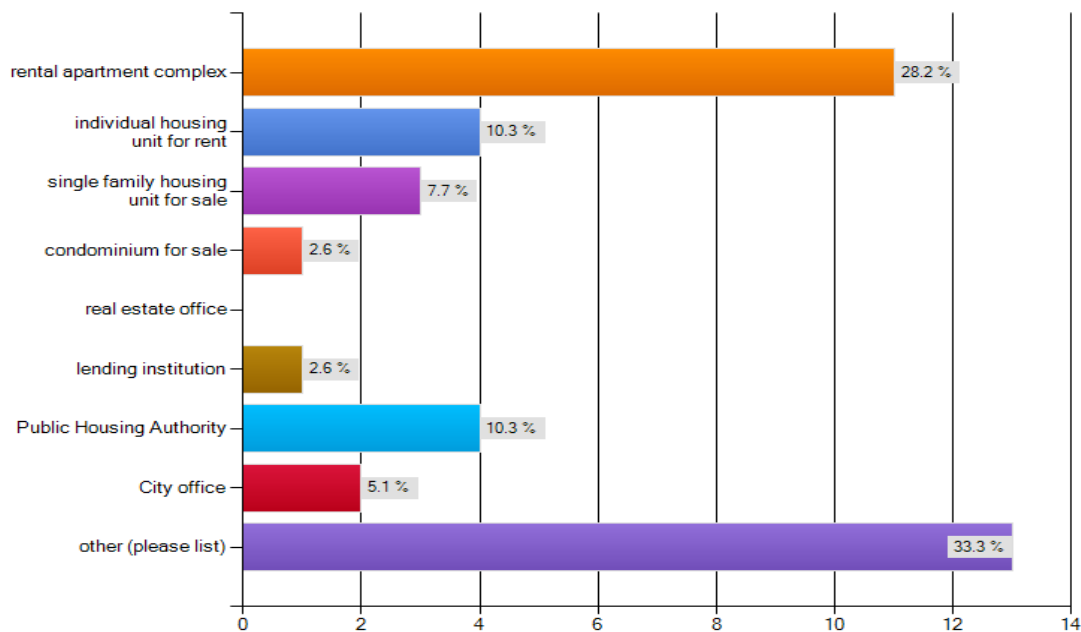
City of Chandler Analysis of Impediments to Fair Housing Choice 2011

Have you or anyone you know ever experienced housing discrimination in the City of Chandler?



Of the 265 survey respondents, 10 persons (4%) feel that they have experienced housing discrimination, 10 persons (4%) know of someone who has, and 245 persons (92%) have not experienced housing discrimination (not having first- or second-hand knowledge).

What best describes the location where the discrimination occurred?

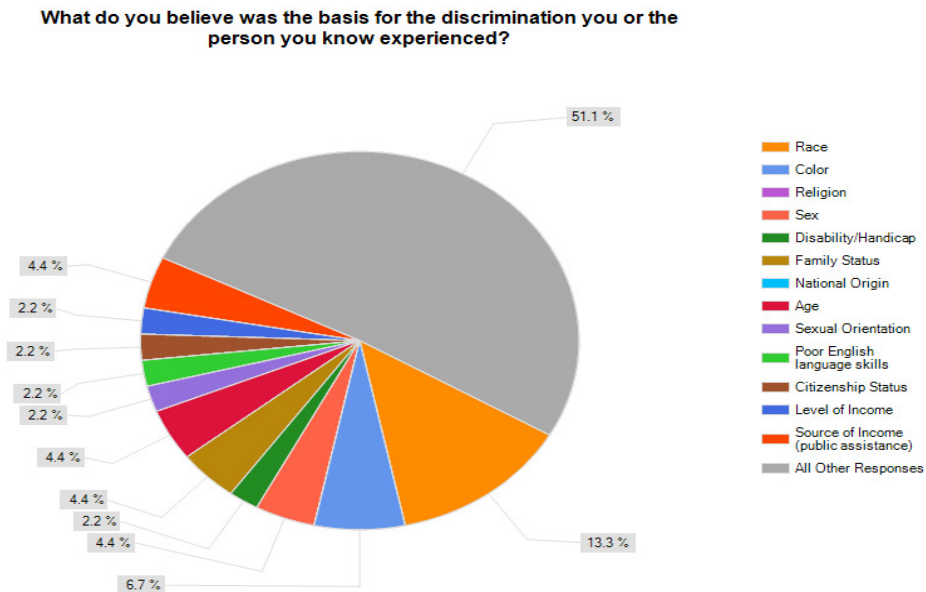


Thirteen respondents listed other locations where they stated that housing discrimination occurred. Of these responses, some experienced discrimination in more than one location. The other locations included:

- lending institution in conjunction with a single family housing unit for sale
- rental apartment complex

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

- individual housing unit for rent
- homeowner's association (HOA) and HOA Board

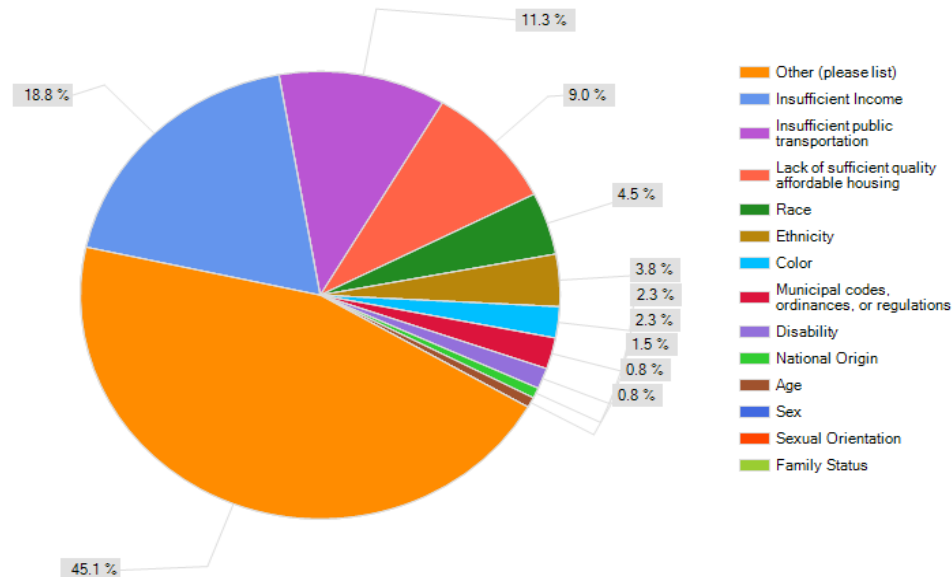


Of the 45 responses to this question, 23 respondents state other bases for the discrimination that was experienced. Of these responses, many experienced discrimination on more than one basis and used the “Other” category to describe that. These responses include, but are not limited to:

- race, religion and level of income
- disability and lack of quality affordable housing
- race, citizenship status, and level of income
- sex, race, color, and victim of domestic violence
- retaliation by a homeowner's association

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

Current Impediments to Fair Housing Choice in Chandler



Of the 133 respondents to this question, the largest impediment to fair housing (not including “Other” responses) is shown as being Insufficient Income, followed by Insufficient Public Transportation and Lack of Sufficient Quality Affordable Housing. Of the 60 responses for “Other,” most felt that there are multiple impediments and used the Other category to describe that. These responses include, but are not limited to:

- race, color, ethnicity, disability, age
- insufficient income, lack of sufficient quality affordable housing, and landlord favoritism by courts
- age, color, ethnicity, insufficient income, insufficient public transportation, and municipal codes, ordinances, or regulations
- lack of clear direction by Chandler Public Housing Agency to housing providers
- lack of proper training of Chandler Housing Authority staff
- all of the above
- being a victim of domestic violence
- government regulation
- neighborhood program does nothing to protect homeowners' rights against bad HOA board practices

Of the citizens surveyed, 25% feel that housing choices are geographically limited to certain areas or neighborhoods in the City of Chandler while 75% do not. The citizens that feel that limitations exist named the following reasons (many of these responses were repeated in various forms):

- race, color, ethnicity
- the housing units are not spread out everywhere
- lack of available housing to rent and having a disability

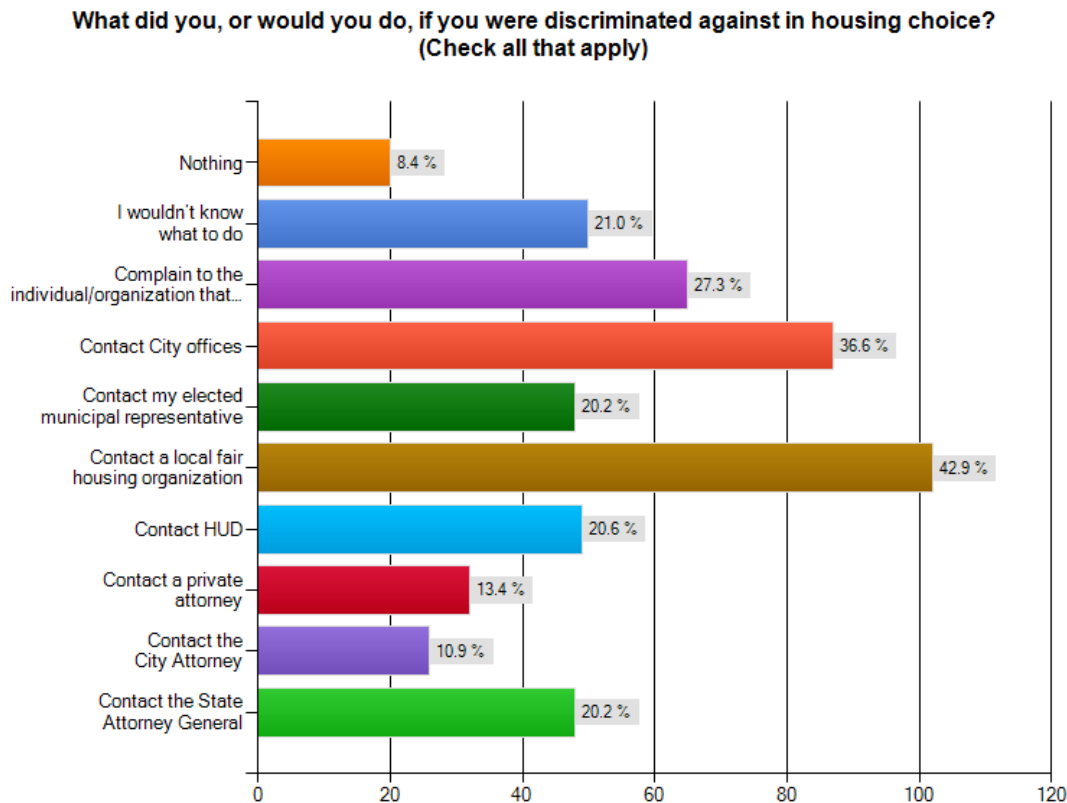
- level of income
- bus availability
- housing in Chandler is not integrated
- we don't want to live in Spanish-speaking neighborhoods, but those are more affordable
- if I wanted to buy or rent in a Hispanic neighborhood, the neighbors would not want me there
- certain neighborhoods are exclusive when it comes to race
- public transportation

When asked if they perceive certain geographic areas or neighborhoods within Chandler to be undesirable, 66% (158) answered affirmatively. In addition, the areas were identified by those surveyed to include (many of these responses were repeated in various forms):

- East Commonwealth, zip code 85225
- downtown
- entire redevelopment area
- Arizona Avenue, from Ray Road to Chandler Boulevard area
- Chandler Boulevard, between McQueen and Arizona Avenue
- Palmer and Pecos Road (too many vacant houses)
- Hartford School area
- South of Boston
- Frye from Arizona Avenue to Alma School Road
- Jamilton and Galveston
- Arizona Avenue, north of the 202
- behind historic Chandler
- Knox Neighborhood – Orchid Lane
- within ½ mile of the city center

The majority of respondents (64%) felt that there was an adequate supply of affordable housing in Chandler; 67% felt an adequate supply was available to senior citizens; and 79% felt that an adequate supply was available to families with children.

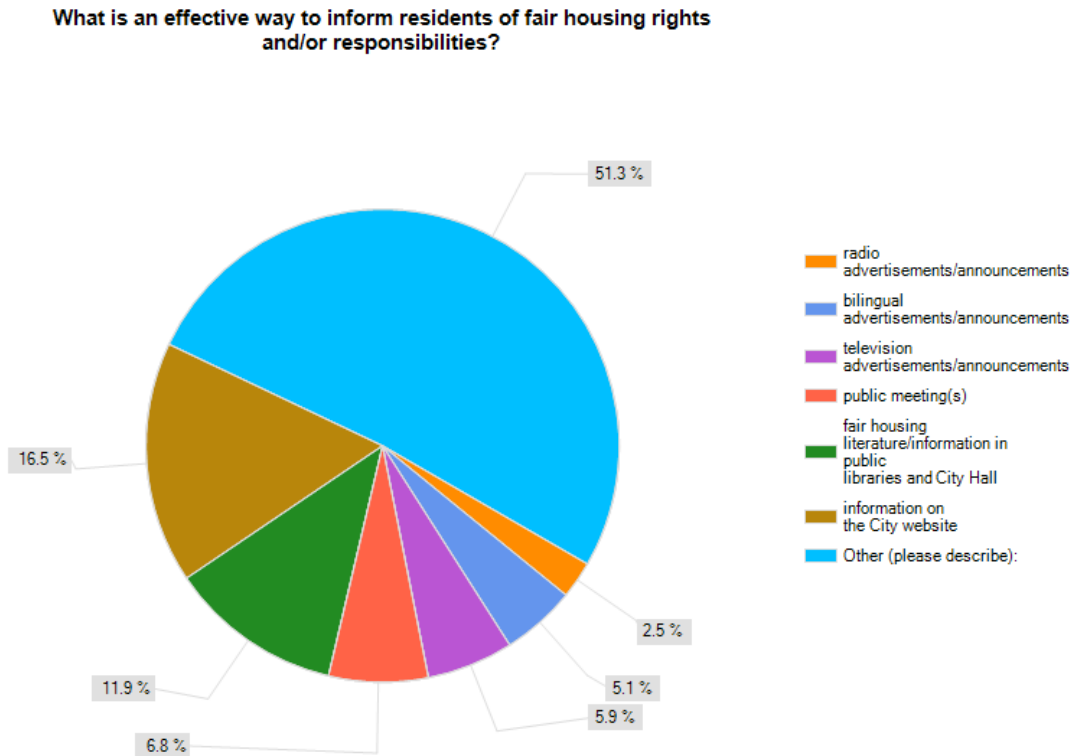
City of Chandler Analysis of Impediments to Fair Housing Choice 2011



The largest number of citizens surveyed (102 persons, or 43%) answered that they would contact a local fair housing organization if discriminated against in housing choice. Other answers were spread throughout the other options.

Based on the survey results, there would appear to be a deficit of fair housing information that is familiar or recognizable to residents. Eighty percent (80%), or 200 persons surveyed, are not familiar with the fair housing or the social services provided by the City of Chandler. In addition, 76% (193 persons) have not seen or heard information regarding fair housing programs, laws, or enforcement within the City of Chandler. When asked if current fair housing laws and enforcement mechanisms are effective, 26% felt they are Highly Effective, 65% felt that they are Somewhat Effective, and 9% felt that they are Not Effective. However, only 49 respondents could identify any fair housing information they saw or heard.

City of Chandler Analysis of Impediments to Fair Housing Choice 2011



Of the 236 respondents to this question, the most effective way to inform residents (not including other responses) is shown as being Information on the City Website, followed by Information in the Libraries and City Hall, and Public Meetings. Of the 121 responses for Other, most felt that there are multiple ways and used the Other category to describe that. These responses include (many of these responses are repeated):

- TV, radio, bilingual ads, and the City website
- public meetings and fair housing literature
- information in utility bills
- door hangers
- mailings
- non-profits
- direct mail postcards with details to get more information
- mail to key low income neighborhoods
- use local independent newspapers
- all of the above

The survey results reflect a recurring theme of the need for more education and public outreach. Surveyed citizens were asked for suggestions to change fair housing laws and practices to increase fair housing choice and/or remove impediments to fair housing. Suggestions included:

- education is the way
- media campaign
- educate property owners and management companies about laws

- make it easier for people to complain; follow up on the complaint; and inform the person on the status
- mail literature to landlords
- have public meetings on Saturdays because most people work during the week
- reach out to advocacy groups to learn more about the subject and what needs to be done
- work with lenders
- provide more affordable housing
- low income housing for seniors and disabled persons
- education about availability
- talk to people, one on one

Additional Surveys

Additional online surveys and questionnaires were created for Housing Service Providers, Realtors, and Lending Institutions in the Chandler area via <http://www.surveymonkey.com>. These surveys were open in September and October and links were sent to over a dozen area service providers, Realtors, and lenders. At the time of publication, five additional service provider surveys had been completed. Ideas stated in the surveys for removing impediments to fair housing and improving fair housing education include:

- need to get the word out in different languages
- make the information easier to read and comprehend
- implement inclusionary zoning for affordable housing
- discrimination related to fair housing still exists
- Chandler has been proactive in promoting affordable housing

Key Person Interviews

In conjunction with the surveys, ASK conducted key person interviews person-to-person, by teleconference, and via email correspondence with members of the City of Chandler Staff, Community Housing Division, State Attorney General's staff, and nonprofit and advocacy groups.

Organization	Key Person
City of Chandler, Housing and Redevelopment	Kurt Knutson, Manager
City of Chandler, Community Development Division	Jennifer Morrison, Neighborhood Services Director Leah Powell, Community Resource Administrator Jessica Fierro, Community Resource Coordinator
City of Chandler, Planning & Zoning	Jeff Kurtz, Planning Administrator

City of Chandler Housing & Human Services Commission	Sharon Rosner, Chair Francisco Heredia, Vice Chair Jenny Holsman Timothy Lewis Kelly Vickrey Ann Stephani Scott Powell Justin Lisonbee Raleigh Grady
Mayor's Committee for People with Disabilities	Denise Demaray, Recreation Coordinator, City of Chandler Members at Large
City of Chandler, Community Services Dept	Collette Prather, Recreation Coordinator
Chandler Channel 11, Government Access Station	Nachie Marquez, Communications & Public Affairs Director
New Town Community Development Corporation, Community Land Trust	Allen Carlson, Executive Director
Community Legal Services	Stanley Silas, Senior Staff Attorney
Southwest Fair Housing Council	Richard Rhey, Executive Director
Arizona Attorney General's Office, Civil Rights Division	Melanie Pate, Chief Counsel
Arizona Fair Housing Center	Ed Valenzuela, Executive Director
Arizona Bridge to Independent Living (ABIL)	Darrel Christenson, Unit Director, Community Integration
Arizona Multihousing Association (AMA)	Jake Hinman, Capitol Consulting

Interviewees were asked a number of questions about fair housing, affordable housing and community service needs in Chandler. In addition, interviewees were asked to complete the applicable survey for supplementary data-gathering. Their responses are summarized within the following public input meeting section. In addition, many key person interview questions are contained in the Appendix section of this document.

Public Input Meetings and Feedback

Members of the general public, as well as representatives of various community groups attended public input meetings. Their input is summarized below. In addition, representatives were asked to complete the applicable survey for supplementary data-gathering. These representatives include:

Member of Public or Agency/Organization Represented
Chandler Nonprofit Coalition
Mathew's Crossing
Save the Family
Housing Our Communities
Arizona Fair Housing Center
Labor's Community Services Agency
Barness East Valley Jewish Community Center
Chandler Christian Community Center
Salvation Army
Community Legal Services
Improving Chandler Area Neighborhoods (ICAN)
Eagles Wings
local residents, business owners, retirees

Fair Housing Awareness

- Chandler was to adopt a Fair Housing Resolution that is substantially equivalent to the Fair Housing Amendments Act of 1988 and the Arizona Fair Housing Act, but that Resolution has not been implemented.
- City staff needs to increase attendance at meetings of fair housing groups.
- The City needs to work together with all advocacy groups and non-profits to work together for solutions to fair housing problems.

Fair Housing Testing

- Although fair housing testing has occurred in the Phoenix metro area, no agency currently conducts fair housing testing in Chandler, specifically.

Fair Housing Training

- City should secure resources (videos) and training from the AG's office.
- City should do training to "command" groups where the City already holds other activities.
- The management staff within the City's PHA and Section 8 program needs more fair housing training to combat internal prejudices.

Fair Housing Enforcement

- The City needs to examine reporting on fair housing referrals to the AG's office; need feedback loop with AG's office to learn disposition of cases.
- Need an in-house plan to service fair housing needs.

- The City needs a comprehensive plan/approach to fair housing. Right now it is a piecemeal approach.

Education and Outreach

- A fair housing brochure has been created for the general public, rental property managers, financial institutions, Realtors, and homeowners associations.
- The citizen newsletter, which includes fair housing information, is mailed out with approximately 8,000 utility bills.
- City needs to increase funding of fair housing education and outreach.
- There is not enough information available from the City regarding fair housing rights and responsibilities.
- Bilingual fair housing education is needed.
- Chandler needs fair housing information in Spanish.
- Fair housing information should be broadcasted on Spanish radio stations.
- Landlords need more information regarding fair housing law.

Public Housing Feedback

The staff of the City's public housing authority has been attending fair housing training on an ongoing basis. Only eight (8) complaints have been received in the years since the last AI and of the eight, only one was a bona fide fair housing case, the Brimm Section 8 case. The Brimm Section 8 case was entered into conciliation. The other cases were usually after the fact reporting when tenants had moved out or were related to the Violence against Women Act. Only five percent (5% or 17 units) of the agency's housing stock were accessible for persons with disabilities. However, if required, the agency would retrofit units to accommodate need. Due to the current housing market, landlords are more willing to accept Section 8 vouchers. There are currently no openings for new applicants in the Section 8 program. It was noted that Section 8 voucher holders shy away from developments with homeowner's associations because of increased restrictions.

Additional Comments from City Staff

Very few cases directly related to fair housing are reported to the City. Example of a case includes an African American male who complained of discrimination regarding issues with his property, particularly property maintenance. The complainant felt he was being dealt with more severely due to race. The matter was resolved. Another case involved a female with a disability who complained about a parking space. Her apartment complex added a space closer to her apartment. The majority of calls to the Fair Housing Hotline are landlord/tenant complaints. Last year there were 38 complaints and only one complaint was about fair housing. The fair housing call was regarding a mobile home on private property with repairs not being completed because the tenant had children. The case was referred to the Attorney General's office.

People may not be aware of their fair housing rights; if people were aware the City would get more calls. Data shows people are more sensitive to racial discrimination; not so sensitive to disability, familial status, etc. In the past, the City's hotline advertised in different ways: public service announcements, recorded message played when people are put on hold when calling anywhere in the City, water bill notification, movie

theater screen advertisements, publications, brochures, Fair Housing Council fairs, and a booth at homebuyer workshops.

The City currently doesn't contract with outside agencies to provide fair housing activities. In the past, the City funded such activities with CDBG funds, but discontinued about two years ago. It was unclear why. The City currently funds Community Legal Services (which provides fair housing services) mainly as a public service and not specifically as a fair housing activity.

City staff identified budget and staffing issues as a challenge to providing fair housing services. They noted that there is a lot more that the City could be doing based on the amount of questions that are being asked by the public regarding fair housing. There is the need for someone to do education and outreach. It was felt that the Attorney General's office has a program that could be utilized. They did a video on housing and foreclosure scams. The staff needs to determine if there are similar programs available with fair housing materials. City staff does receive phone calls -- mostly conflicts between family members, undocumented aliens, and informal "handshake" lease agreements. Many of those who call have no recourse. Some call when they are about to be evicted, when repairs have not been made, when they have credit issues, etc.

One suggestion was to establish a mediation panel to resolve complaints of housing discrimination. The City has a current relationship with a mediation group that can be expanded to include fair housing. For persons with disabilities, the City started a new ADA home modification program: a \$10,000 grant per household to help up to 10 owners per year complete ADA modifications.

Comments Regarding the Mayor's Committees on Aging and Disabilities

Currently these two committees are being used for social and community activities that motivate and encourage these populations. Activities such as fundraisers, scholarship programs and an annual senior expo are the current mainstay. The committees are looking at broadening their scope, but funding is limited. City staff identified both groups as a means of providing fair housing education and awareness to these populations.

Public Meetings for Approval of the AI

On November 10, 2010, the City of Chandler Housing and Human Service Commission approved the AI document during their regularly scheduled public meeting. Pertinent portions of the meeting's minutes are included as Appendix 5. The AI Executive Summary was available, including a link to the AI document, for the public via the City's website for a public comment period of at least 30 days. No comments were received. On December 9, 2010, the Chandler City Council approved the AI for adoption during their regular meeting as Ordinance #4473.

Public Outreach

City of Chandler

In June 2008, the City of Chandler held a **Fair Housing Seminar** to educate Chandler citizens, landlords, and tenants about fair housing rights and responsibilities. Presenters included:

- City of Phoenix Landlord/Tenant Counselor
- Southwest Fair Housing Council
- Office of the Arizona Attorney General
- Community Legal Services
- City of Chandler Police Department
- City of Chandler Code Enforcement
- City of Chandler Financial Management and Support

Topics covered during the Seminar included:

- Landlord/Tenant Act
- Fair Housing Refresher
- Americans with Disabilities Act
- Section 8 and Public Housing Participants
- Crime Free Lease Addendum
- AMA 5-Star Program for Rental Communities
- Top 8 Code Violations
- Rental Tax

During FY 2009-2010, the City's Community Development Assistant devoted 15% of staff time to the promoting Fair Housing activities. These activities include:

1. Distributed to the public 350 copies of various pamphlets and other literature including the Fair Housing Brochure and a copy of the resolution adopted by Council. This literature effectively informs residents of basic fair housing rights, and how to detect and report unlawful housing discrimination, and provides the address and telephone number of the Fair Housing Hotline. All brochures and informative materials are available in Spanish and English.
2. For all recipients of assisted housing, a copy of *Fair Housing, It's Your Right, Ten Most Common Mistakes* and a City fair housing complaint form were included in their briefing packet.
3. Maintained a fair housing hotline which was manned by staff until 2009 but the line now uses a voice mail message and refers complaints to the Arizona Attorney General's office.
4. Distributed to housing providers and real estate companies 50 copies of a brochure detailing the *Ten Most Common Fair Housing Mistakes*.
5. Continually provided information on the City's Fair Housing Hotline through the City's water bill, in both English and Spanish.
6. Participated in Arizona Fair Housing Partnership (AZFHP) activities, including attending the monthly meeting; participating in a video on age-restricted housing issues that is viewed at all AZFHP events; staffed a booth at the City of Chandler Homebuyer Fair as a member of the AZFHP; and participated in developing the new information and referral section of the AZFHP web page.

7. Maintained a call log for fair housing complaints and referrals. The City's hotline received 45 calls on fair housing – 41 from tenants and 4 from landlords. Callers were referred to the Arizona Attorney General's Office and the Arizona Fair Housing Center.

The City of Chandler currently has 26 advisory boards and commissions with seats held by citizens. The commitment to each board or commission varies, but most meet once per month for several hours. Information regarding available seats and applications is available on the city's website. Citizens may be appointed to the following boards and commissions. Additional information is provided for those boards/commissions that may be involved fair housing issues:

- Airport Commission
- Architectural Excellence Award Committee
- **Architectural Review Committee** - this five-member committee is responsible for reviewing building exterior improvements.
- Arts Commission
- Board of Adjustment
- **Board of Appeals for Building, Electrical and Housing Codes** - this five-member board makes recommendations and suggestions to assist the Building Division in making interpretations of the Building, Electrical, Mechanical, Plumbing, Housing and Abatement Codes, and decides upon the approval of equipment, materials and alternates.
- Chandler Citizen's Panel for Review of Police Complaints and Use of Force
- Chandler Cultural Foundation Management Board
- Domestic Violence Commission
- **Economic Development Advisory Board** – this fifteen-member board advises the City Council in essential policies, rules, regulations and other matters relating to the Economic Development Program of the City of Chandler.
- **Housing and Human Services Commission** – this eleven-member commission serves in an advisory capacity to the City Council and Public Housing Authority Commission on matters affecting Public Housing programs and the Section 8 rental assistance programs. The Commission is responsible for making recommendations to the City Council on the annual allocation of Community Development Block grant funds. The Housing and Human Services Commission assesses the human service needs of the community and is the final authority that determines distribution of the annual allocation of City funding for human service agency applicants.
- **Human Relations Commission** – this eleven member commission seeks to broadly represent the diverse demographics of the community. The Commission acts as an advisory board to the City Council by recommending ways to encourage mutual respect and understanding among the many groups of people who live, work and spend time within the community. The Commission makes recommendations to discourage all manner and manifestation of discriminatory practices and assists the City Council and City departments on ways in which people from different racial, cultural or religious backgrounds can be made to feel at home within the Chandler community.
- Industrial Development Authority

- Library Board
- **Mayor's Committee for the Aging** – this seven-member Committee serves as a liaison between the City Council and the general community in matters regarding the aging. In general, they advise the City Council on essential policies, rules and regulations relating to advocacy issues experienced by the aging of the community, such as accessibility, volunteerism, and adult day care.
- **Mayor's Committee for People with Disabilities** – this committee consists of nine members that assist and advise the City Council and staff on essential policies, rules and regulations relating to advocacy issues experienced by the disabled of the community, such as accessibility, education and employment.
- Mayor's Youth Commission
- Merit System Board
- Chandler Municipal Property Corporation
- Museums Advisory Board
- **Neighborhood Advisory Committee** - this seven-member committee is responsible for implementing the recommendations formulated by the Neighborhood Task Force and addressing new neighborhood issues as may be identified. Other areas of focus include recommendations on creating, maintaining and enhancing neighborhood programs; reviewing and recommending revisions to the City Code in order to ensure the City Codes are up to date, applicable to conditions in Chandler, clearly understandable, and enforceable; and recommending programs which will educate Chandler residents as to the importance and benefits of perpetual neighborhood longevity.
- Parks and Recreation Board
- **Planning and Zoning Commission** - the seven members of the Commission recommend the establishment of zones and districts limiting the use, height, area and bulk of buildings and structures, and hear and make recommendations to the City Council on matters relating to the zoning or rezoning of property. The Commission also recommends to the City Council land use plans and policies for regulating the future growth, development and beautification of Chandler.
- **Public Housing Authority Commission** - this eight member commission is comprised of the members currently serving on the City Council with the addition of one resident commission member. The Commission is the governing authority for matters related to the administration, operation and management of the federal public housing and rental assistance programs administered by the City.
- Public Safety Personnel Retirement Systems Local Board – Fire
- Public Safety Personnel Retirement Systems Local Board – Police
- **Transportation Commission** - the seven members advise the City Council on issues concerning community transportation policies including freeway, arterial streets, public transit, bicycle and pedestrian issues. The Commission will work to review, monitor and propose changes to the Transportation Study, Transit Study and Bicycle Plan and will advise the Public Works Director in establishing priorities at budget time in relation to transportation programs and projects. The Commission will assist staff in developing criteria for neighborhood traffic mitigation programs and projects.

The **Chandler Channel, Cable Channel 11**, is a government access station that broadcasts news about City meetings, services, events, and the community. Chandler Channel programming includes:

- **The Mayor's Review**, a review of community topics hosted by the Mayor;
- **Chandler In Focus**, a look at community issues hosted by a Chandler Councilmember;
- **Come Out and Play**, a program promoting the recreation and leisure opportunities in Chandler;
- **Sprinkler's Clubhouse**, a children's show about safety issues;
- **Community Bulletin Board**, with information on community events and job openings;
- **City Council Meetings**, televised live;
- **City Council Study Sessions**, televised live; and
- **Planning and Zoning Commission Meetings**, televised live.

The Chandler **Acts of Kindness** donation program, or A-OK for short, was developed in July 2000 to give residents an opportunity to voluntarily contribute \$2 (or more) with their utility payment each month. The contributions collected go back into the community through a grant process to support a variety of human service programs who provide basic needs such as food, shelter, clothing, medical services and transportation to low income Chandler residents.

City of Chandler **HOA Academy** provides classes on key concepts and issues relating to home owners associations, and discusses how to address challenges affecting those living in an HOA. The Academy consists of six evening classes, and Chandler residents completing five of the six classes will receive a Certificate of Completion and recognition at a future City Council meeting.

City of Chandler **Neighborhood Registration Program** is designed to foster greater communication between neighborhood groups and the City of Chandler. The Neighborhood Programs Division educates residents on the benefits of neighborhood organization and provides support to neighborhoods working to improve their neighborhood. The neighborhood registry provides a direct link between a neighborhood and the City of Chandler, and can be used by City staff to contact neighborhoods regarding issues of interest.

City of Chandler **Neighborhood Grant Program** is open to all Chandler neighborhoods that participate in the Neighborhood Registration Program. The Neighborhood Grant Program is open all year and offers the following three grants: traditional Neighborhood Grants provide funds up to \$5,000 once every five years; HOA Matching Grants provide funds up to \$5,000 once every five years; and Annual Jump Start Grant provide funds up to \$500 once a year. Grant projects are evaluated and selected based on a series of criteria including neighborhood benefit, resident involvement and financial need.

Other Public Outreach

Solve-It! Community Mediation Service is available to Chandler residents. Solve-It! Mediation is a program of the Leadership Centre, a non-profit 501(c)(3) that provides Arizona residents with information, resources and tools that create and support effective community leaders. Solve-It! Mediation promotes awareness of productive problem-solving by providing facilitation and mediation services at the community level, in addition to educational training and outreach in conflict resolution skills. Solve-It! works in partnership with community organizations, municipal services, schools and the East Valley Justice Court system to promote self-determination and accountability in the conflict resolution process. Solve-It! currently offers mediation and facilitation services for a wide range of community issues. The most common cases that Solve-It! mediates are: Landlord/Tenant issues; HOA Board issues; Animal control issues; Property and Contract issues; and Interpersonal issues.

The **Arizona Attorney General (AG) Civil Rights Division's** website (http://www.azag.gov/civil_rights/fairhousing/) offers information to the public on housing discrimination facts, the Fair Housing Act (FHA), Tenants Rights and Responsibilities handbook, FHA Accessibility Compliance Site Review form, and a direct link for making a housing discrimination complaint. Much of this information is also available in Spanish form. Since 2005, the AG Civil Rights Division has assisted with one public outreach effort in Chandler by giving a presentation regarding fair housing at the seminar sponsored by the City of Chandler on June 14, 2008.

The **Chandler Non-Profit Coalition (CNPC)** was formed to:

- Provide visibility and awareness about non-profits to the business community;
- Combine resources and partnerships that will foster relationships between the non-profit community;
- Allow the community at large to become more aware of the non-profits serving in their community;
- Form partnerships between the community, City and CNPC to enhance funding opportunities;
- Share best practices and common issues between non-profits.

The mission of CNPC is to improve the performance of Chandler non-profit organizations by promoting social responsibility and community action through awareness building, collaboration, and advocacy.

As noted previously, the City of Chandler provided one-year, in-kind support for the work of the **Southwest Fair Housing Council (SWFHC)**, through the 2009 HUD Education and Outreach Initiative (EOI) program grant. SWFHC is a non-profit agency funded by memberships, donations, HUD, the Arizona Department of Housing, and CDBG funding. SWFHC works to ensure fair housing by providing a variety of free services directed toward education and enforcement:

- Investigating individual complaints of housing discrimination;
- Obtaining evidence to support enforcement action by public agencies conducting legal or administrative actions;
- Initiating complaints and litigation to serve fair housing goals;
- Informing and advising community residents of their fair housing rights, including presentations at community meetings and special events;

- Conducting mediations;
 - Conducting conferences, training programs, and seminars to inform housing professionals about housing laws;
 - Assisting businesses, neighborhood groups, agencies, and units of government in the development of fair housing goals, plans and strategies, and actions; and
 - Providing information and referrals for persons and families with housing needs.
- (Source: <http://www.swfhc.com/about.htm>)

SWFHC presented fair housing information at the City of Chandler Fair Housing Seminar on June 14, 2008.

The **Arizona Fair Housing Partnership** (AZFHP) is a statewide coalition of government agencies, housing industry representatives, non profit organizations and housing advocates. The purpose of the AZFHP is to:

- Provide information to the public and policy officials regarding fair housing;
- Sponsor fair housing training for housing professionals;
- Monitor discriminatory practices and recommend actions to overcome fair housing barriers;
- Strive to achieve a discrimination free housing market through the partnership model; and
- Recruit agencies and representatives to promote equal access to fair housing.

The City of Chandler, Community Development Section, is a partner of the AZFHP.

On April 15, 2009, the Arizona Fair Housing Partnership hosted a Fair Housing Workshop at the Disability Empowerment Center in Phoenix. The Workshop focused on housing discrimination issues and provided training for property management companies, community groups, HOAs, and persons owning/operating rental properties. A panel of fair housing experts, including Arizona Attorney General Terry Goddard, was featured.

The **Arizona Multihousing Association** (AMA) is a non-profit advocacy association for the rental housing industry. They do not participate in direct outreach to the public, but the AMA is a partner of AZFHP. Every year the AMA offer fair housing training for landlords, leasing agents, and managers. The training classes are taught by attorneys who specialize in fair housing. AMA presented fair housing information at the City of Chandler Fair Housing Seminar on June 14, 2008.

Community Legal Services (CLS) is a not-for-profit Arizona law firm incorporated in 1952 as a legal aid program organized to promote equal access to justice for all. CLS provides legal services to clients in certain civil (non-criminal) areas of the law that affect the critical needs of the low income client community. These services are provided to individuals and families residing in the CLS five county service areas, including Maricopa County and Chandler, whose household income is at or below 125% of the federal poverty guidelines. According to the CLS Housing and Foreclosure Law Project – Maricopa County (East Valley Office), CLS has provided services and support for fair housing questions and/or disputes in the City of Chandler. CLS presented

information to Section 8 and Public Housing participants at the City of Chandler Fair Housing Seminar on June 14, 2008. In addition, CLS provides training regarding fair housing rights and responsibilities in East Valley through the City of Mesa and Nan McKay and Associates (NMA).

The **Arizona Fair Housing Center (AFHC)** is a private, non-profit civil rights advocacy organization. Its mission is to eliminate housing discrimination through enforcement, education and outreach. AFHC is funded by federal and local governments, and private donations, but is not currently funded by the City of Chandler. AFHC can perform the following fair housing services:

- Intake of fair housing complaints;
- Systemic investigation of housing discrimination;
- Referrals to attorneys and government agencies;
- Counseling and mediation; and
- Provide technical assistance and professional support to government agencies, civil rights organizations, housing providers, social service agencies, and other housing industry professionals.

The **Arizona Bridge to Independent Living (ABIL)** is Arizona's largest center for Independent Living. ABIL offers and promotes programs designed to empower people with disabilities to take personal responsibility so they may achieve or continue independent lifestyles within the community. ABIL offers services to facilitate implementation of the Americans with Disabilities Act (ADA) throughout the state including ADA training, technical assistance and materials to businesses and persons with disabilities on the requirements and options of the ADA. ABIL offers advocacy services with the intent of facilitating cooperative compliance. ABIL provides ADA counseling on larger projects such as facility surveys and job accommodations. ABIL is a partner within the Arizona Fair Housing Partnership and includes coverage of Maricopa County. ABIL estimates that they receive approximately 300 phone calls per month from the public, and that one-third of those calls are housing related. Information regarding cases/ calls specifically within the City of Chandler is not available.

Eagle's Wings is a non-profit organization with the mission to develop eco-friendly, universally designed special needs housing, and provide community empowerment centers to promote successful living. The vision of Eagle's Wings is to: create an unencumbered living environment with specific focus on the community housing needs for special needs persons and veterans; create a community in which people can be empowered and trained to a new mindset for successful living, and their ability to create and manage income is improved; and to provide youth programs to strengthen their minds and bodies through sports, and to prepare them to become future leaders through mentoring. Eagle's Wings has been a participant of the Chandler Non-Profit Coalition.

VI. FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

Impediments Found

The research, surveying, and interviews conducted for the AI does not identify any substantial fair housing impediments within the City of Chandler. City of Chandler, county and state levels of government have made efforts to be proactive in encouraging fair housing education and funding activities to support fair housing, although public education needs to be ongoing.

There are some areas, however, that could potentially become barriers to fair housing choice in Chandler. These include:

- *Education and Outreach:* This is the greatest area of impediments to fair housing. The City does not have a Fair Housing Officer, but the City does use a Community Development Assistant to undertake fair housing activities. Survey results, interview responses, and analysis of fair housing complaint data indicate that the Chandler community does not have a comprehensive understanding of fair housing rights and responsibilities. There is a limited awareness of fair housing programs for protected classes. The majority (57%) of citizens surveyed feel that they are not knowledgeable of fair housing laws. Eighty percent (80%), or 200 persons surveyed, are not familiar with fair housing or social services provided by the City of Chandler. In addition, 76% (193 persons) have not seen or heard information regarding fair housing programs, laws, or enforcement within the City of Chandler.

Data from the AG's Office shows that the majority of cases are dismissed without cause. Further education of the general public regarding fair housing law could help possible complainants understand fair housing rights and determination of cause. Lastly, there exists a lack of outreach to existing groups, commissions, and organizations.

- *Fair Housing Testing:* There is no fair housing testing specifically for Chandler.
- *Fair Housing Mediation:* There is no group funded by the City to perform fair housing mediation.
- *Data Collection, Tracking and Follow-Up:* There is no mechanism in place for the City to collect data, track, or follow-up on fair housing complaints handled by/referred to other entities. There is no central reporting system for fair housing complaints within the City of Chandler.
- *Housing Counseling:* There are no known housing counseling services available/advertised within Chandler. Many first-time homebuyers have little or no knowledge of fair housing laws and/or illegal discriminatory practices and/or predatory lending. A target for these illegal activities is often minority populations with poor credit.
- *Lack of Sufficient Affordable Housing Choices:* As noted in the FY 2010-2014 Consolidated Plan, there exists a lack of affordable housing choices and a lack of incentives such as density bonuses, fee waivers, and similar programs that encourage construction of affordable housing.

- *Accessible Housing:* There is a need for the City to evaluate ADA education and accessible housing needs.
- *Discrimination Related to Rental Properties:* Survey results and interviews point to the existence of some landlords who refuse to rent to minority applicants, decline to rent to families with children, and will not make accommodations for disabled persons. Survey results and interviews indicate that this discrimination may occur with landlords within the Section 8 program as well.

ACTIONS TO ADDRESS PREVIOUSLY IDENTIFIED IMPEDIMENTS

Based on the research and data available, the following Action Plan and activities are recommended to reduce impediments to fair housing within the City of Chandler. Chandler's previous Analyses of Impediments to Fair Housing provided recommendations for specific actions that the City of Chandler could take to reduce impediments to fair housing choice. This section briefly reviews some of those previously recommended actions from the 2008 Analysis, and provides an update on City actions and updated recommendations.

Impediment #1: A higher percentage of low to moderate income residents of Chandler report that they experience more discrimination compared to those with a higher income. This is likely to be due to low to moderate income persons feel they have no choice but to accept the discrimination practices because their income falls below the median family income.

Recommendations 1 - 2

"Distribute to the public at least 2,000 copies per year of the various pamphlets and other literature maintained in our office, for example, the Fair Housing Brochure and a copy of the resolution adopted by council. This literature has proven to be very informative on acquainting residents with basic fair housing rights, and how to detect and report unlawful housing discrimination. The literature also provides the address and telephone number of the Fair Housing Hotline. For all recipients of assisted housing, enclose a copy of the pamphlet Fair Housing, It's Your Right in their briefing packet and a copy of the complaint form used to issue a complaint that can be filed with the Housing and Redevelopment Division. Also enclosed is an information phone list that includes the Fair Housing Hotline."

Current status:

During FY 2009-2010, the City's Community Development Assistant did the following:

- Distributed to the public 350 copies of various pamphlets and other literature including the Fair Housing Brochure and a copy of the resolution adopted by the Council. All materials are available in Spanish and English.
- For all recipients of assisted housing, a copy of *Fair Housing, It's Your Right, Ten Most Common Fair Housing Mistakes*, and a City fair housing complaint form were included in their briefing packet.

In addition, the City's public housing agency provides materials for its landlords and maintains fair housing information on its website and is actively pursuing training of its staff on fair housing issues on an ongoing basis. Website materials are provided in several languages through an online language translator. There doesn't seem to be a deliberate education program for landlords. However, due to the current market conditions, many more landlords are willing to accept Section 8 vouchers now than before the current economic downturn.

Updated recommendations:

1. The City should continue to make the distribution of the Fair Housing Resolution a priority, including distribution to Realtors, housing providers, non-profits, and other community organizations.
2. Based on the responses to the fair housing surveys, the City has developed a wide network of collaborative partnerships with several non-profits and other community stakeholders such as the Chandler Non-profit Coalition and the Chandler Symphony. Judging by the response to the AI, this network seems willing and able to disseminate information on fair housing issues and should be used in this effort.
3. While focus should be on all of the protected classes, the City may wish to pay specific attention and take positive action to address discrimination on the basis of familial status and disability.

Impediment #2: Landlords and other housing providers are unaware how some of their day to day policies and practices amount to violations of fair housing laws especially familial status discrimination.

Recommendations 1-4

"Distribute at least 200 copies per year of the brochure detailing the Ten Most Common Fair Housing Mistakes to housing providers and real estate companies. During national fair housing month in April a copy of the resolution adopted by Council will be distributed to over 300 real estate companies, housing providers, non-profit organizations, and other community organizations informing the public of fair housing laws and Chandler's commitment to enforcing them. Run a 30 second public service announcement on Chandler Channel 11 informing the public of the fair housing hotline and staff available to help with fair housing complaints. Continue the Fair Housing Hotline that is regularly published in the City's newsletter that is distributed through the water bill."

Current Status:

During FY 2009-2010, the City's Community Development Assistant did the following:

- Distributed to housing providers and real estate companies 50 copies of a brochure detailing the Ten Most Common Fair Housing Mistakes.
- Maintained a fair housing hotline which was manned by staff until 2009, but now uses a voice mail message to refer complaints to the Arizona Attorney General's office.

- Maintained a call log for fair housing complaints and referrals.
- Continually provided information on the City's Fair Housing Hotline through the City's water bill, in both English and Spanish.

The City advertises Fair Housing Month in its newsletter and on its cable channel which reaches 58,000 subscribers. The public channel previously had a local news special and interview show but did not feature fair housing as a specific topic for interview. As noted, due to budgetary constraints the City's Fair Housing Hotline was not staffed after FY 2009 and serves to refer callers to the Arizona Attorney General's Office.

Updated Recommendation:

It is recommended that the City fund a staff person to operate the Fair Housing Hotline. If budget constraints do not permit the staffing of the Fair Housing Hotline, the City needs to establish a feedback/tracking mechanism for calls/cases referred to the Arizona Attorney General's Office (this is further detailed in a New Recommendation). In addition, the City should ensure that all information is available in Spanish on the Fair Housing Hotline. It is recommended that the Communications and Public Affairs Department do a special presentation on fair housing via Chandler Channel 11, perhaps during Fair Housing month. The City takes advantage of the myriad of cultural events to promote City services and information. Fair housing information could be added to that promotional delivery system.

Impediment #3: A large percentage, especially in the most low to moderate income areas of the City, is Spanish speaking residents. These residents feel that many services available to them are inaccessible due to their inability to speak English.

Recommendations 1-3

"Provide all brochures and informative materials in Spanish and English. Ensure that, if staffed, the Fair Housing Hotline always has a Spanish speaker available to offer assistance to Spanish speaking residents. Ensure that assistance is available to all persons in completing forms and issuing Fair Housing complaints with the Attorney General's Office."

Current Status:

The City has all of its housing and community development information, including fair housing material in both Spanish and English. The City's website including the public housing agency page has a language translator which translates information into several languages. The fair housing hotline is only available in English. The Arizona Attorney General's office has both English and Spanish speakers to handle relevant cases.

Updated Recommendation:

The City's voicemail message on the Fair Housing hotline should include a Spanish message. The City should also track hotline cases, demographics, and resolution through the Attorney General's office.

Impediment #4:

The City had enacted a housing occupancy code that limits the number of persons who can reside in a residential dwelling by the number of bedrooms the housing unit has. The code may prove to severely restrict housing choices for prospective buyers if it is rigidly enforced. During a previous AI, two townhouse subdivisions presented barriers to housing choice to large families with children.

Current Status: The matter was resolved and homeowner's associations were asked to desist from addressing the matter themselves.

ACTIONS TO ADDRESS EXISTING IMPEDIMENTS

A. Impediment: Lack of Fair Housing Education and Outreach; and Lack of Fair Housing Officer

Action: Improve Fair Housing Education and Outreach; Staff a Fair Housing Officer position

Recommendation 1

The City should maintain a Fair Housing Officer to consistently be available to address fair housing issues. That person should maintain representation and active participation with fair housing service providers.

Status:

The City does not have a Fair Housing Officer, but does have a Community Development Assistant who devoted 15% of staff time to fair housing activities in FY 2009-2010. Included in that staff time, the Community Development Assistant participated in Arizona Fair Housing Partnership activities.

Recommendation 2

The City should use the existing institutional structure to disseminate fair housing information, provide fair housing education opportunities, and assist with fair housing complaint referrals.

Status:

There exists an extensive institutional structure of nonprofits and other service groups that could be used to disseminate fair housing information and provide education. In addition, these existing groups could assist with outreach efforts by properly referring citizens with potential fair housing complaints. The 2007 Chandler Human Services Needs Assessment included information that stated that most human service organizations in the City are underutilized. The City should target local, countywide, and statewide organizations for this purpose, including but not limited to: Mayor's

Committee for the Aging; Mayor's Committee for People with Disabilities; Chandler Nonprofit Coalition; Arizona Fair Housing Center; Community Legal Services; Southwest Fair Housing Council; and Arizona Fair Housing Partnership. By providing fair housing outreach efforts to these organizations, the City would engage a command audience that currently receives little or no fair housing information.

Recommendation 3

Use existing institutional structure to quarterly survey agencies and organizations for status of fair housing complaints and issues and assess data on a bi-yearly basis for any needed follow-up.

Status:

There currently exists no mechanism for the City to track and follow-up on fair housing issues that may be reported to other groups or organizations. In conjunction with Recommendation 1, the City could also target their outreach efforts to existing organization meetings to survey, track, and assess fair housing issues. If needed, the City could take any needed action or follow-up by the Fair Housing Officer.

Recommendation 4

Use Chandler Channel 11 programming and website, and the City newsletter to reach more citizens with fair housing information.

Status:

The City uses Chandler Channel 11 and the newsletter to distribute fair housing information during Fair Housing Month, but should use these venues all year. Specifically, the "Chandler In Focus" segment and "Community Bulletin Board" programming could spotlight fair housing rights, responsibilities, and education. Chandler Channel 11 programming, the City website, and the City newsletter have the potential to reach many protected classes of people with fair housing information.

Recommendation 5

Use the Mayor's Committees on Disabilities and Aging to disseminate information and increase awareness of fair housing issues and discrimination among the elderly and persons with disabilities. It is recommended that at least two fair housing education seminars be held with each group annually. Also provide fair housing materials for dissemination at the senior centers and through the housing provider agencies on the two committees.

Status:

The Senior Center has been a site for information brochure and requests for housing since 1998. No fair housing complaints have been received there.

B. Impediment: Lack of Fair Housing Testing to Determine Where Fair Housing Discrimination Is Taking Place

Action: Fund Fair Housing Testing

Recommendation 6

The City should invest in fair housing testing with an organization such as the Southwest Fair Housing Council, Community Legal Services, or Arizona Fair Housing Center. The City should examine fair housing testing data and analyze it (annually or bi-annually) for trends in fair housing discrimination against protected classes.

Status:

Although the survey results reflect that fair housing discrimination does take place in Chandler, there is currently no specific testing data for the City of Chandler. Analyzing data from fair housing testing would allow the City to determine how and where to target fair housing education efforts.

C. Impediment: There Is No System to Collect Data, Track and Follow Up on Fair Housing Cases Within the City of Chandler

Action: Improve Fair Housing Data Collection, Tracking, and Follow Up

Recommendation 8

The City should establish a feedback mechanism for cases referred to the Arizona Attorney General's Office.

Status:

The current Chandler Fair Housing Hotline only serves to refer citizens to the Arizona Attorney General's Office. The City currently does not collect data, track, or follow up on the referred fair housing cases that occur in Chandler. Data collection, tracking, and follow up would allow the City to be aware of fair housing issues affecting protected classes within the City of Chandler.

D. Impediment: First-Time Homebuyers, Particularly Minority Populations, May Be Subject to Fair Housing Discrimination and/or Predatory Lending

Action: Fund Housing Counseling

Recommendation 9

The City should include funding for housing counseling services and leverage resources such as scholarships to NeighborWorks training (via Neighborhood Housing Services of Phoenix, Inc.). The City should also work with local financial institutions to sponsor housing counseling certification.

Status:

The City of Chandler 2008 General Plan included a recommendation that the City arrange and support housing affordability counseling by social services agencies and institutions. Although the City of Chandler does not directly fund agencies conducting housing and credit counseling services, there are such agencies in the community. Consumer Credit Counseling Services Southwest and Community Services of Arizona, Inc. offer homebuyer education, pre- and post-purchase counseling, home equity conversion counseling, debt management counseling, renter assistance, and mortgage delinquency and default resolution services. A lack of certified housing counselors for protected classes was identified as an impediment.

E. Impediment: Accessible Housing Needs Exist

Action: Evaluate ADA Education and Accessible Housing Needs

Recommendation 10

The City should continue to make efforts to provide builders with information packets regarding ADA requirements, post requirements on the City's website, and incorporate ADA requirements in the development review and permitting process of housing construction.

Recommendation 11

It is recommended that the City consider addressing the apparent deficit of affordable housing that is ADA accessible by having the Mayor's Committee for People with Disabilities conduct a comprehensive review of the ADA accessible housing unit levels of supply and demand. Using that data, the City can support the development and/or retrofitting of additional ADA accessible housing units. This would also encourage the Mayor's Committee to broaden their scope and assist the City's fair housing efforts.

Status:

According to the Planning and Zoning Review of Public Policies and Practices completed by City staff, the zoning ordinance does not deny housing opportunities for disabled individuals with on site housing services. However, the planning and zoning code does not include a definition of "disability." In addition, the zoning ordinance does not contain any special provisions for making housing accessible to persons with disabilities.

F. Impediment: Alleged Fair Housing Discrimination at Rental Properties, Including Within the Section 8 Program

Action: Eliminate Discrimination Related to Rental Properties

Recommendation 12

The City should provide additional training, education, and monitoring of landlords within the City of Chandler generally, and the Section 8 program specifically.

Recommendation 13

The City's Fair Housing Officer should convene representatives of the City's Section 8 Program, HUD, and other groups that address fair housing issues to develop information-sharing regarding fair housing discrimination and a fair housing education program for Section 8 Staff and Landlords.

Current Status:

Survey results and interviews point to the existence of landlords who refuse to rent to minority applicants, decline to rent to families with children, and will not make accommodations for disabled persons. Survey results and interviews indicate that this same type of discrimination occurs with landlords within the Section 8 program as well.

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APPENDIX 2— Loan Applications and Denials by Census Tract**Source:** Data extracted for City of Chandler from HMDA, Aggregate Table 1, 2008

1. Census Tracts where the denial rate exceeds the City average of 25.5% are highlighted in YELLOW.
2. "Minority" Tracts have a minority % that exceeds the City total (21%) by at least 10%. In all such "minority" Tracts the denial rate exceeded the City average (25.5%). These are highlighted in RED.

Census Tract	Applications	Denials	Denial Rate	% Minority	% of MSA Median Income
4222.09	281	93	33.1%	32%	89%
4222.10	313	104	33.2%	24%	106%
4222.11	147	39	26.5%	16%	147%
4222.18	166	54	32.5%	24%	105%
4222.19	169	44	26.0%	24%	117%
4222.20	114	22	19.3%	19%	156%
4223.04	66	19	28.8%	29%	86%
5227.11	317	65	20.5%	24%	145%
5227.12	161	46	28.6%	29%	119%
5227.13	286	76	26.6%	22%	129%
5227.14	177	55	31.1%	28%	164%
5227.15	46	24	52.2%	41%	83%
5227.16	155	27	17.4%	17%	185%
5227.17	657	133	20.2%	18%	175%
5227.18	327	96	29.4%	24%	150%
5227.18	282	105	37.2%	23%	124%
5227.21	300	64	21.3%	28%	159%
5227.22	240	55	22.9%	24%	171%
5227.23	240	105	43.8%	19%	140%
5227.24	159	47	29.6%	19%	140%
5227.25	287	24	8.4%	24%	148%
5227.26	287	75	26.1%	27%	131%
5227.27	211	58	27.5%	20%	142%
5227.29	267	84	31.5%	29%	108%
5227.30	399	100	25.1%	23%	153%
5227.31	386	82	21.2%	23%	145%
5227.32	283	56	19.8%	30%	139%
5227.35	279	42	15.1%	8%	132%
5227.36	3,479	780	22.4%	29%	120%
5227.48	146	33	22.6%	23%	130%
5227.49	682	88	12.9%	17%	137%
5229.02	343	149	43.4%	68%	75%
5230.02	282	102	36.2%	55%	83%
5230.03	369	123	33.3%	39%	100%
5230.05	283	76	26.9%	24%	125%
5230.06	249	87	34.9%	33%	108%
5231.02	180	61	33.9%	61%	82%
5231.03	273	74	27.1%	31%	118%
5231.04	159	58	36.5%	68%	80%
CITY TOTAL	13,447	3,425	25.5%	21%	109%

APPENDIX 3 - Survey Instruments

Citizen Fair Housing Survey:

This survey is for the Analysis of Impediments to Fair Housing Choice (A.I.), a document required of the City of Chandler by the U.S. Department of Housing and Urban Development (HUD). The Federal Fair Housing Act prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability. The A.I. seeks to identify impediments to fair housing choice, defined by HUD as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race color, religion, sex, disability, familial status, or national origin.

THIS SURVEY IS FOR INFORMATIONAL PURPOSES ONLY, AND ALL SURVEY RESPONDENTS' IDENTITIES WILL REMAIN ANONYMOUS.

1. Do you live within the limits of the City of Chandler or have your address listed as the City of Chandler?

Yes
No

2. Which ethnic or cultural group do you consider yourself a member of?

Please check one:

Anglo/White
African American/black
Hispanic/Chicano/Latino
American Indian/Native American
Asian/Oriental/Pacific Islander
Multi-racial
Other (please specify)

3. What is your current marital status? Please check one.

Married
Single head of household
Domestic partners
Divorced
Widowed

4. Which income category does your total household income fall into? Please check one:

Less than \$20,000
\$20,001 to \$30,000
\$30,001 to \$40,000
\$40,001 to \$50,000
\$50,001 to \$60,000
\$60,001 to \$70,000
\$70,001 or more

5. Do you, or someone in your household, qualify as a "protected class" according to the Fair Housing Act? (Please see next question for a list of protected classes.)

Yes
No, (please skip to question #7)

6. If you answered "Yes" to question #6, to which protected class do you/your household belong? (check all that apply)

Race
Color
Religion
Sex

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

National Origin
Familial Status (family with one or more persons under 18 years of age)
Disabled/handicapped
Age

7. Do you have children under the age of 18 years?

Yes
No
Other

8. Housing discrimination can occur if someone is denied housing or housing financing based on which of the following categories (check all that apply):

Race
Color
Religion
Sex
Disability/Handicap
Family Status (family with one or more persons under 18 years of age)
National Origin
Age
Sexual Orientation
Poor English Language Skills
Citizenship Status
Level of Income
Source of Income (public assistance)
Other (please list)

9. How much do you know about Fair Housing Laws, including State of Arizona Fair Housing Law?

Very Knowledgeable
Somewhat Knowledgeable
Not Knowledgeable

10. Have you or anyone you know ever experienced housing discrimination in the City of Chandler?

Yes, I have
Yes, a person I know has
No
Other

11. If yes, which of the following best describes the person or organization that discriminated against you or the person you know?

rental property manager/owner
seller of a housing unit
condominium or homeowner's association
real estate professional
loan officer or mortgage broker
municipal employee
other (please list)

12. What best describes the location where the discrimination occurred?

rental apartment complex
individual housing unit for rent
single family housing unit for sale
condominium for sale
real estate office
lending institution
Public Housing Authority
City office
other (please list)

13. What do you believe was the basis for the discrimination you or the person you know experienced?

Race
Color

City of Chandler Analysis of Impediments to Fair Housing Choice 2011

Religion
Sex
Disability/Handicap
Family Status
National Origin
Age
Sexual Orientation
Poor English language skills
Citizenship Status
Level of Income
Source of Income (public assistance)
Other (please list)

14. What do you see as current impediments to fair housing choice, if any, within the City of Chandler?

Race
Color
Ethnicity
National Origin
Sex
Sexual Orientation
Family Status
Disability
Age
Insufficient Income
Lack of sufficient quality affordable housing
Insufficient public transportation
Municipal codes, ordinances, or regulations
Other (please list)

15. Do you feel your housing choices are geographically limited to certain areas or neighborhoods in the City of Chandler?

No
Yes
If yes, on what basis? (please select from lists above at questions #12 and/or #13)

16. Do you think that affordable housing options are located throughout the City of Chandler, or are they concentrated in certain areas/neighborhoods?

Spread throughout the City of Chandler
Concentrated in certain areas/neighborhoods, such as:

17. Do you perceive certain geographic areas or neighborhoods within the City of Chandler to be undesirable?

No
Yes
If yes, please identify:

18. Do you feel that there is an adequate supply of affordable housing that is available to all residents?

Yes
No
Why/why not?

19. Do you feel that there is an adequate supply of affordable housing that is available to disabled residents?

Yes
No
Why/why not?

20. Do you feel there is an adequate supply of affordable housing that is available to senior citizen residents?

Yes
No
Why/why not?

21. Do you feel there is an adequate supply of affordable housing that is available to residents with children?

Yes
No
Why/why not?

22. What did you, or would you do, if you were discriminated against in housing choice? (Check all that apply)

Nothing
I wouldn't know what to do
Complain to the individual/organization that discriminated against me
Contact City offices
Contact my elected municipal representative
Contact a local fair housing organization
Contact HUD
Contact a private attorney
Contact the City Attorney
Contact the State Attorney General
Other (please identify)

23. Are you familiar with fair housing or social services provided by the City of Chandler?

Yes
No

24. Have you seen or heard information regarding fair housing programs, laws, or enforcement within the City of Chandler?

List the services you know of such as senior, youth, disability, and employment services. Provide names/descriptions, if possible.
Yes
No, (please skip to question #26)

25. If you answered yes to question #24, what information have you seen/heard? (check all that apply)

fair housing flyers or pamphlets
fair housing handbook
fair housing public service announcement on the radio
fair housing public service announcement on the television
other (please list):

26. Do you think that adequate fair housing information is available in other language translations?

Yes
No

27. In your opinion, how effective are the current fair housing laws, programs, and enforcement mechanisms?

Very Effective
Somewhat Effective
Not Effective

28. What do you feel would be the most effective way to inform the residents of Chandler about their fair housing rights and/or responsibilities? (check all that apply):

public meeting(s)
fair housing literature/information in public libraries and City Hall
television advertisements/announcements
radio advertisements/announcements
bilingual advertisements/announcements
information on the City website
Other (please describe):

29. Do you have any suggestions for changes to fair housing laws and practices that would increase fair housing choice and/or remove impediments to fair housing choice?

If yes, please list:

30. Please list below what additional actions would you suggest that the City of Chandler could take to address impediments and improve fair housing choice for all residents:

THANK YOU FOR PARTICIPATING IN THE HOUSING CONSUMER SURVEY. YOUR RESPONSES WILL INFLUENCE IMPORTANT FAIR HOUSING PLANNING DECISIONS MADE BY THE CITY OF CHANDLER. IF YOU HAVE QUESTIONS ABOUT THE CONTENT OF THIS SURVEY, PLEASE CONTACT THE CITY OF CHANDLER NEIGHBORHOOD RESOURCES, COMMUNITY DEVELOPMENT DIVISION AT (480)782-4320.

APPENDIX 4 - Key Person Interview Questions

PUBLIC HOUSING DEPARTMENT

1. What procedures are used to ensure fair housing choice? Tenants? Landlords.
2. At move in? Annual recertification?
3. Number of public housing units? # of vouchers?
4. Numbers of complaints or lawsuits last five years?
type of complaints? protected classes?
5. Types of fair housing education initiatives? Tenants? Landlords?
6. # of units for disabled persons?
7. Actions to address impediments and improve fair housing choice

PLANNING & ZONING

1. Transportation policy and practice relative to allow access to housing citywide
2. Accommodations for disabled persons, elderly
3. Translation incentives for low and very low income
4. Training for drivers, certification (annual and initial)
5. Incentives for affordable housing
6. Nearness to affordable housing? Connectors

HOUSING & HUMAN SERVICES COMMISSION

1. State general definition of Fair Housing Act
2. Purpose & scope of AI
3. Advertise online survey & library access
4. General discussion – questions needed

CHANDLER NONPROFIT COALITION

1. State general definition of Fair Housing Act
2. Outline purpose & scope of AI
3. Advertise online survey & library access
4. General discussion – questions needed

MAYOR'S COMMITTEE FOR SENIORS & PEOPLE WITH DISABILITIES

1. Outline Fair Housing Act & purpose & scope of AI
2. Number of seniors and Persons with Disabilities served by the City
3. Availability of housing choices for seniors and persons with disabilities
4. Incidences of housing discrimination with persons? Are statistics available?
5. How are complaints handled and resolved?
6. What are the avenues for getting fair housing information to persons with disabilities?
7. What are impediments to fair housing choice
8. Suggestion for addressing impediments and improved fair housing choice

GOVERNMENT ACCESS STATION

1. How does channel promote City's Fair Housing strategies currently?
2. Review of Fair Housing Act & Purpose & scope of AI
3. Does the channel have bi/multi lingual outreach?
4. Does the channel receive any complaints? If yes, type?
5. Does channel do any education sessions or programs by itself or in collaboration with other entities?
6. What are impediments?
7. Suggestions for reducing impediments and increasing fair housing choice?

APPENDIX 5

(The following is an excerpt of the HHSC Minutes.)

**MINUTES
THE HOUSING AND HUMAN SERVICE COMMISSION
City of Chandler
City Hall Complex
Neighborhood Resources Division Conference Room
235 S. Arizona Avenue
Chandler, Arizona 85225
Wednesday, November 10, 2010**

Members Present: Ann Stephani, Scott Powell, Kelly Vickrey, Sharon Rosner, Timothy Lewis, Justin Lisonbee, Jenny Holsman, and Raleigh Grady

Excused Members Absent: Francisco Heredia and Natalie Krebs

Staff Present: Kurt Knutson, Leah Powell, Jennifer Morrison, and Carl Morgan

Guests Present: Stephanie Small, Cory Underhill, Christy McClendon, and Christine Wetherington

CALL TO ORDER

Quorum was established and the meeting was called to order at 6:12 p.m.

PUBLIC HEARING FY10-15 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Mr. Morgan presented the information on the 2010-2015 Analysis of Impediments to Fair Housing Choice (AI) and opened the public hearing. Commissioner Holsman inquired if there were impediments in the existing AI. Mr. Morgan responded that there were no substantial impediments but rather some minor ones.

Chair Rosner asked if the AI was broken down into action items that the City would be able to undertake. Mr. Morgan replied yes that City staff will implement the recommendations.

Commissioner Vickrey inquired as to who prepared the AI and staff replied that it was Christopher Plummer from ASK Development. Commissioner Vickrey stated that there did not appear to be any glaring issues rather a need for more education. Mr. Morgan replied in the affirmative.

Regarding item #8, Commissioner Stephani questioned if we should specifically be asking for these types of services (homebuyer, debt management, and related housing and financial counseling) through the allocations process. Ms. Morrison explained that currently the City's NSP funding was covering these items and agencies could ask for more in the next round of NSP funding. Commissioner Stephani inquired if staff would provide more Fair Housing education or if the City would contract those services. Mr.

Morgan replied that City staff would be implementing the education activities and information would be provided to homebuyers and renters. Existing information sources such as the City's Channel 11 and City publications will be utilized.

Commissioner Grady inquired if the AI goes to HUD and Mr. Morgan responded that it is part of the required process to receive funding from HUD. Commissioner Vickrey asked Mr. Knutson if there were any surprises in the report and he responded in the negative. In addition, Mr. Knutson stated that he is currently applying for a grant for the Self Sufficiency Program and that Fair Housing is a piece of that as well. Commissioner Grady asked how this would look in Gilbert and Mr. Morgan replied that Gilbert had the same process and a very similar outcome.

ACTION AGENDA

Approval of Resolution No. 4473 Adopting the City of Chandler FY 10-15 Analysis of Impediments to Fair Housing Choice

Commissioner Vickrey made a motion to recommend to City Council the approval of Resolution No. 4473 adopting the 2010-2015 Analysis of Impediments to Fair Housing Choice. Commissioner Lewis seconded the motion. The motion passed unanimously.